



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
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## MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/Ig/63 DATE: November 30, 2006

C.C.: RRG/Clayton Site Technical Committee  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: **Status Report # 13 for the Resource Recovery Group/Clayton Chemical Company Site**

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this thirteenth Monthly Status Report is October 23, 2006, through November 24, 2006.

### EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (The Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 12 was submitted to U.S. EPA on October 31, 2006.

### 1.0 COMPLETED ACTIVITIES

#### 1.1 PRE-MOBILIZATION, MOBILIZATION, AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities completed during the reporting period centered on implementing a soil treatment technology for the management of the mixed waste (Resource Conservation and Recovery Act [RCRA] and Toxic Substances Control Act [TSCA]) soils that have been generated from excavation activities, reestablishing an on-Site presence, and reinitiating waste shipment activities. Additional details of the completed tasks are provided for review in this report.

A weekly summary of activities appears below:

- During the week of October 23, 2006 (October 23 - 27, 2006), the primary activities that were completed were the plastic integrity survey at Stockpile # 4/4B, and the loading and shipment of miscellaneous



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ENGINEERING DESIGN

laboratory chemicals off-Site for disposal. On October 24, 2006, BISCo relocated the upper portions of stockpiles # 4/4B to a prepared section of the EZ 4 Work Zone before using an excavator to expose a total of nine locations within the interior of the two stockpiles. The locations within stockpile # 4 revealed that there was no plastic sheeting present at the center and eastern portions of the stockpile footprint. Conversely, the examination of the five locations within the footprint of stockpile # 4B showed that plastic sheeting was present. On October 25, 2006, personnel from Veolia Environmental Services, Inc. (Veolia) were present at the Site to prepare various containers of laboratory chemicals and miscellaneous household hazardous substances for shipment and disposal. These material were segregated and placed inside four laboratory overpack containers and transported to the Veolia Trade Waste Incinerator facility in Sauget, Illinois for final disposal;

- The primary activities completed during the week of October 30, 2006, involved the submission of a notification letter to OSC Turner on October 31, 2006, and the completion of the initial phase of collecting Site survey data on November 2, 2006. The notification letter informed OSC Turner and the U.S. EPA of The Respondents' intention to begin backfilling six select excavations at the Site on or after November 7, 2006 and that OSC Turner had until that date to provide comments to the proposed action. On November 2, 2006, Juneau Surveyors and Engineers collected survey data at the RRG/Clayton Site to document the location of Site features created by the performance of the mandated Removal Action (RA) activities. Additionally, the proposed preliminary landfill cover design information was submitted to OSC Turner, the U.S. EPA, and the IEPA on November 3, 2006. These documents were provided to obtain for review and comments;
- For the week of November 6, 2006, Site-related activities centered on the installation of backfill material into select excavations. BISCo accepted delivery of 43 loads (1,144 tons) of Aggline material on November 7 and 8, 2006 for the purpose of backfilling the excavations associated with sample locations TP-13, TP-44, TP-47, TP-54, GP-15, and GP-20. Backfilling of the indicated excavations, with the exception of GP-15, was also completed on November 7 and 8, 2006. Additional backfilling activities were completed on November 9, 2006;
- The primary focus of Site-related activities for the week of November 13, 2006 was preparing a response to OSC Turner's request for performing an investigation of the loading dock at the Waste Drum Storage Building, and making preparations for the treatment of the remaining soils. On November 13, 2006, the U.S. EPA contacted The Respondents for an update on the status of the response and on November 14, 2006, analytical data was provided to support The Respondents' opinion that an investigation of the dock was not warranted. On November 15, 2006, The Respondents received verbal authorization from OSC Turner to proceed with the chemical oxidation treatment of the mixed RCRA/TSCA soils at the Site. BISCo subsequently prepared the expected work areas for the soil treatment on November 16 and 17, 2006. Additionally, CRA prepared a demonstration to the IEPA Bureau of Air related to the ability of the Site to perform the volatile organic compound (VOC) removal treatment without the need to install any emissions control measures. This demonstration was submitted to the IEPA and the U.S. EPA on November 18, 2006; and
- For the week of November 20 through 24, 2006, the key Site activity centered on the processing of impacted excavated soils for off-Site transportation and disposal. Between November 20 and 22, BISCo and EQ processed 28 batches (an estimated 1,000 tons/670 cubic yards) of soils by applying powdered potassium permanganate ( $\text{KMnO}_4$ ), and water to the target material. Post-treatment samples were collected from the treated materials from Stockpile # 5C and Stockpile # 2 on November 21 and 22, 2006, respectively. No activities were performed on November 23 and 24, 2006 due to the Thanksgiving holiday.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for October 23 – 27, 2006; Appendix B – Weekly Summary of Site Activities for October 30 – November 3, 2006; Appendix C – Weekly Summary of Site Activities for November 6 – 10, 2006; Appendix D – Weekly Summary of Site Activities for November 13 – 18, 2006; and Appendix E – Weekly Summary of Site Activities for November 20 – 24, 2006.

## **1.2 SAMPLING AND ANALYSIS**

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by the Respondents. This request was approved by OSC Turner on April 20, 2006.

During the reporting period, analytical results were received for the decontamination confirmation samples collected on October 19, 2006, the waste characterization samples collected on October 17, 2006, during the investigation of the EZ 4 Work Zone loading dock, and a waste characterization sample of the contents of a drum of recovered oil. Following the loading out of the contents of the former tank G8, the stick and bucket of the excavator used were decontaminated and ten wipe samples were collected to determine the effectiveness of the decontamination procedures. A summary table of the analytical from those samples and a sample key are included as Appendix F, while Appendix G contains a copy of the analytical report of these sample results.

On October 17, 2006, CRA and BISCo performed an investigation of the concrete loading dock located along the eastern edge of the EZ 4 Work Zone. The investigation revealed the presence of soil-like materials, drum carcasses, a drum with an orange-brown sludge material, and dried paint waste within the drum carcasses. CRA collected samples of the soil-like material and the sludge for waste characterization analysis. These samples were taken to TEK-Lab, Inc. of Collinsville, Illinois (TEK-Lab) for analysis. A summary table of those analytical results and a sample key are included as Appendix H, while a copy of the analytical report is included as Appendix I.

As part of ongoing waste disposal activities with Veolia, a sample was collected from a drum of recovered oil at the Site and submitted for PCB analysis. This sample was collected on October 17, 2006 by BISCo, was designated sample Drum A-1, and was submitted to TEK-Lab for analysis. Appendix I also contains the analytical results from this sample.

The only samples collected during the reporting period were the two post-treatment samples collected from Stockpile # 5C and Stockpile # 2 on November 21 and 22, 2006, respectively. These samples were submitted to the EQ Wayne Disposal facility to be analyzed for the presence of Toxicity Characteristic Leaching Procedure (TCLP) VOCs to measure the effectiveness of the chemical oxidation process. Analytical results from these samples were not available prior to the end of the reporting period.

### **1.3 REMOVAL ACTION WORK**

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through E of this report.

### **2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS**

No significant technical problems were encountered during the reporting period. With the exception of possible weather-related delays, no additional problems or issues are anticipated for the upcoming period.

### **3.0 ANALYTICAL DATA GENERATED/RECEIVED**

As mentioned in Section 1.2, a total of two samples were collected at the RRG/Clayton Site during the reporting period. These samples were comprised of two soil samples intended to determine the effectiveness of the chemical oxidation treatment process. However, the analytical results for those samples were not available before the end of the reporting period.

During the reporting period, analytical results were received for ten decontamination confirmatory wipe samples, one soil sample, one sludge sample and one oil sample. Copies of the analytical results for these samples are provided in Appendices G, and I. Those data, with the exception of the results from the oil sample, are also summarized in tabular form in Appendices F and H, along with the respective sample keys.

### **4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD**

#### **4.1 SITE PLANS**

During the upcoming reporting period (November 27, 2006, through December 22, 2006), the following activities are anticipated:

- EQ, BISCo, and CRA will complete VOC treatment of the stockpile # 4/4B, and, following receipt of acceptable confirmatory data, will ship those treated soils from stockpiles # 2, 4/4B, and 5C to EQ Wayne for disposal as a TSCA waste;
- EQ will complete off-Site disposal of the sludge from tank G8 at the Veolia Port Arthur, Texas facility;
- The remaining drummed materials at the Site will be processed for off-Site disposal in accordance with the analytical results from the collected waste characterization samples;
- The shipment of materials off-Site for disposal will continue;
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the remaining removal activities; and
- Site restoration activities, including excavation backfilling, will be initiated.

## 4.2 SAMPLING AND ANALYSIS

During the upcoming reporting period, material characterization samples will be collected to determine the effectiveness and/or completion of the soil treatment activities. Personnel from EQ will collect or supervise the collection of the process samples, which will be submitted to the EQ Wayne Disposal Facility laboratory for analysis. The samples will be analyzed for the presence of TCLP VOCs. These samples will be collected and analyzed for disposal characterization in accordance with typical industry practices and standards.

As needed, waste characterization samples may be collected from additional waste materials at the RRG/Clayton Site to facilitate off-Site disposal.

## 4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the assembly of hazardous and non-hazardous wastes, soil treatment activities, soil management activities, waste characterization, and disposal activities. An anticipated schedule for these activities appears below.

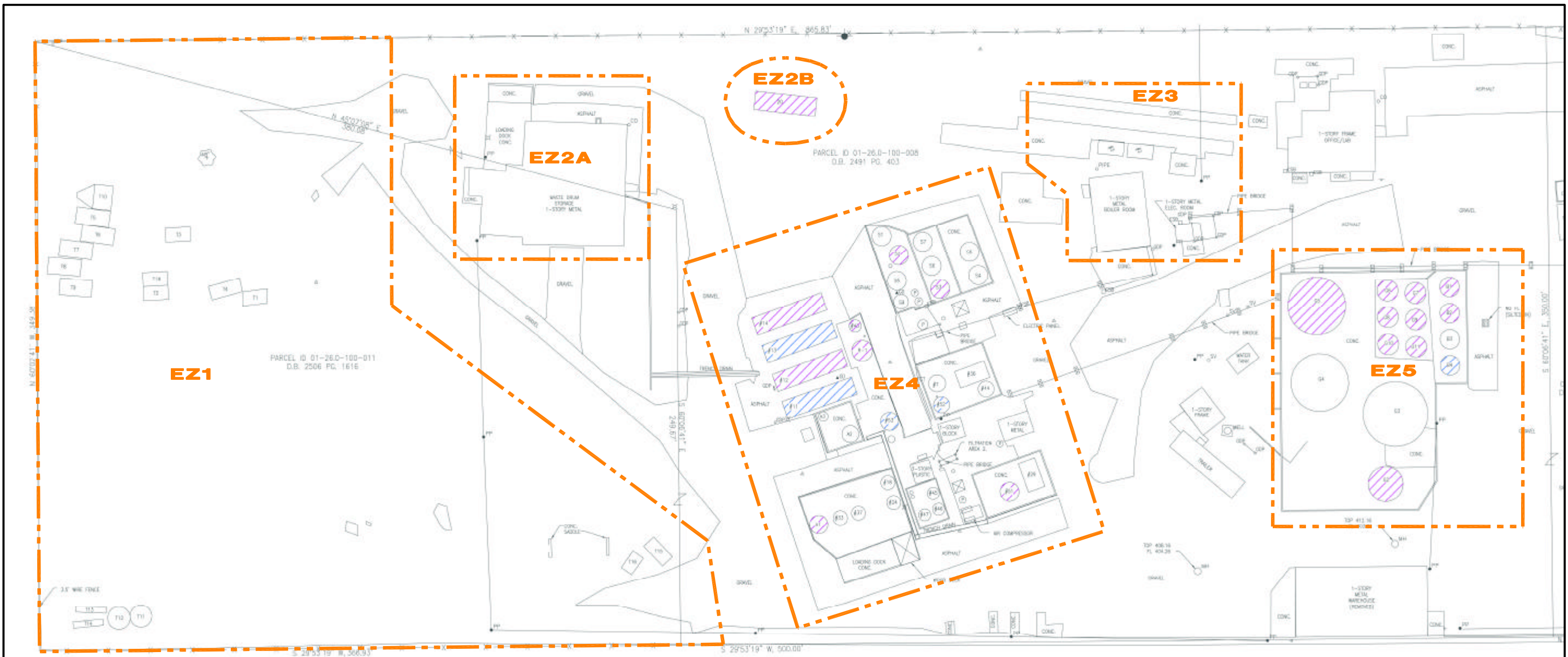
## 5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Install Stormwater Control Measures	As needed/ongoing	November 27, 2006
Continue Tank Sludge Disposal Activities	Ongoing/30 days	November 27, 2006
Continue Characterization of Drum Wastes/Drum Processing Activities	Ongoing/30 days	November 27, 2006
Continue Assembly of Site Wastes For Off-Site Shipment	Ongoing/30 days	November 27, 2006
Continue Technical Design, and Construction Scheduling of Proposed Landfill Cap	Ongoing/30 days	November 27, 2006
Continue Characterization of EZ 4 Loading Dock Materials/Wastes	Ongoing/30 days	November 27, 2006
Arrange For Transportation and Disposal of EZ 4 Loading Dock Materials/Wastes	Ongoing/30 days	November 27, 2006
Continue Soil Treatment and Removal Activities	3 weeks	November 27, 2006
Initiate Site Restoration Activities	Ongoing/30 days	December 4, 2006
Submit Status Report # 14	1 day	December 29, 2006

Attachments

FIGURE 1

SITE MAP



**LEGEND**

CABLE SERVICE BOX	POWER POLE
CLEANOUT	GUY WIRE
ELECTRIC SERVICE BOX	PIPE BRIDGE FOUNDATION
FAUCET	SEWER VENT
FIRE HYDRANT	WATER MANHOLE
GAS DRIP	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GAS VALVE	TANKS WITH "WEEPING"
GUIDEPOST	TANKS WITH SOLIDS REMAINING
LIGHT STANDARD	
MAILBOX	
SIGN	
MANHOLE	
OLD IRON PIPE	

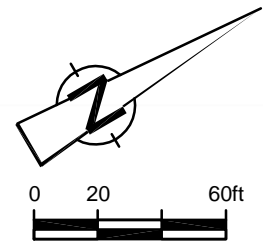


figure 1  
 SITE WORKZONE LAYOUT MAP  
 RRG CLAYTON CHEMICAL  
 Sauget, Illinois



## APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR OCTOBER 23 – 27, 2006





**CONESTOGA-ROVERS  
& ASSOCIATES**

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## MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Marcia R. Sivek/lg/59 DATE: November 30, 2006

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
G. Daley

RE: **Weekly Summary Of Site Activities For October 23 - 27, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the forty-seventh week (the period October 23 through October 27, 2006) is presented below.

Date	Tasks	Activity
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	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning/Removal	No activity. CRA continue discussions with Veolia regarding scheduling the removal of the G8 materials from the Site
	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity

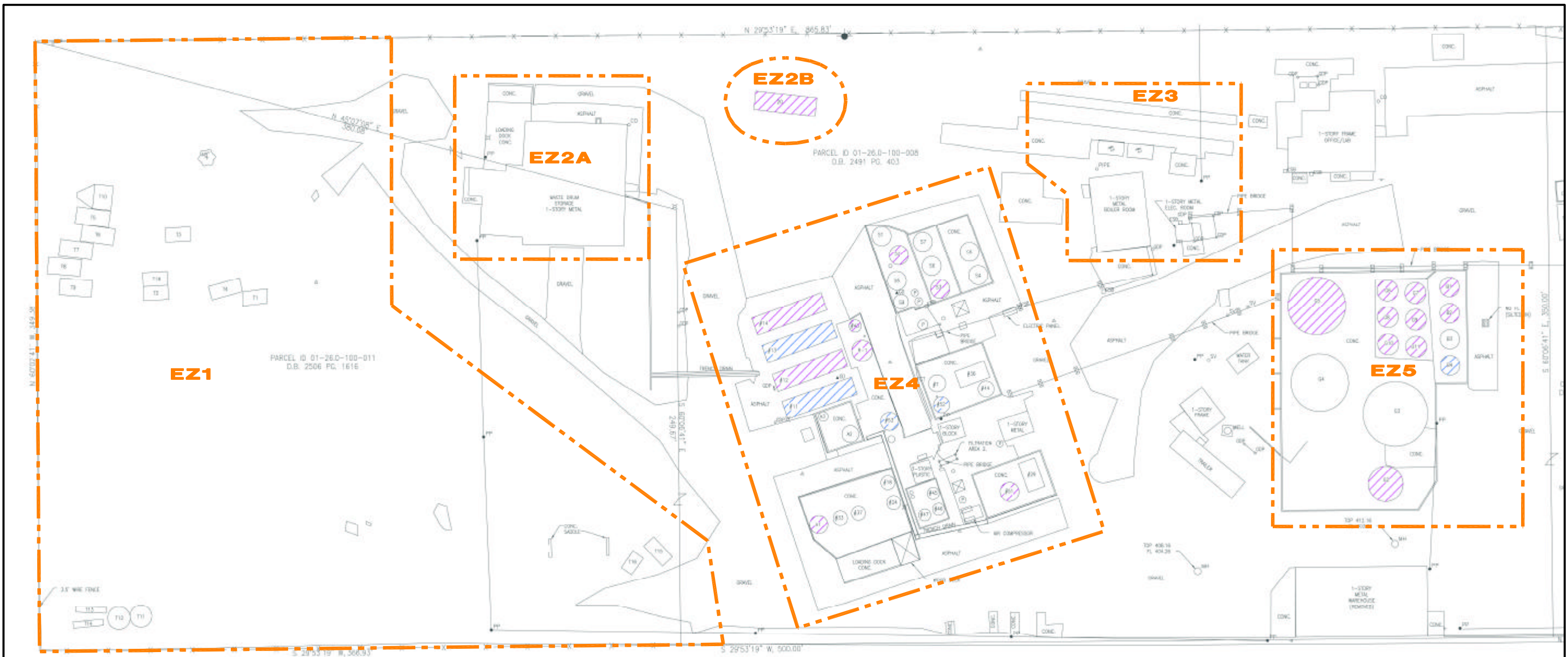
Date	Tasks	Activity
October 23, 2006	Miscellaneous	CRA received analytical results from the decontamination confirmation samples collected following the loading of the contents of tank G8 on October 19, 2006
October 24, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present to lead plastic investigations beneath Stockpiles # 4 and # 4B. CRA sent a confirmatory e-mail to START Hill to document the October 17, 2006, conversation in which the plastic investigation/inspection protocol requested by OSC Kevin Turner was discussed. The e-mail was also forwarded to OSC Turner by The Respondents. OSC Turner requested that The Respondents complete an investigation of the Waste Drum Storage Building loading dock to verify the presence of drum carcasses
	Site Preparation	BISCo prepared an area of the EZ 4 Work Zone by cleaning a concrete pad and installing reinforced plastic sheeting to accommodate relocation of impacted soil stockpiles
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning/Removal	No activity. CRA continue discussions with Veolia regarding scheduling the removal of the G8 materials from the Site
	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date, roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06

Date	Tasks	Activity
October 24, 2006	Soil Sampling/Excavation	The upper portions of stockpiles # 4 and 4B were relocated to the eastern portion of the EZ 4 Work Zone in the vicinity of stockpile # 5C to facilitate a U.S. EPA-requested inspection/investigation of plastic sheeting beneath these partially relocated stockpiles. This inspection/investigation revealed that plastic sheeting was only present and primarily intact for the western portion and edges of stockpile # 4. Also, the inspection/investigation determined that intact plastic sheeting was in place for the center portion of stockpile # 4B (plastic sheeting was previously identified at the edges of both stockpiles)
	Miscellaneous	No activity
October 25, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present on Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning/Removal	No activity. CRA continued discussions with Veolia regarding disposal options for remaining tank contents on Site
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	Veolia on site to lab pack miscellaneous containers in the building on Site. Total weight of material packed was approximately 565 pounds
October 26, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present on site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06

Date	Tasks	Activity
October 26, 2006	AST Sampling/Cleaning/Removal	No activity. CRA continued discussions with Veolia regarding disposal options for remaining tank contents on Site
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity
October 27, 2006	Mobilization Activities	BISCo and CRA personnel demobilized from the Site
	Project Coordination	START Bob Hill was not present on Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning/Removal	No activity. CRA continued discussions with Veolia regarding disposal options for remaining tank contents on Site
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), Marcia Sivek (312-402-1776) or Phil Harvey (773-380-9246) for clarification.

Attachment



**LEGEND**

CABLE SERVICE BOX	POWER POLE
CLEANOUT	GUY WIRE
ELECTRIC SERVICE BOX	PIPE BRIDGE FOUNDATION
FAUCET	SEWER VENT
FIRE HYDRANT	WATER MANHOLE
GAS DRIP	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GAS VALVE	TANKS WITH "WEEPING"
GUIDEPOST	TANKS WITH SOLIDS REMAINING
LIGHT STANDARD	
MAILBOX	
SIGN	
MANHOLE	
OLD IRON PIPE	

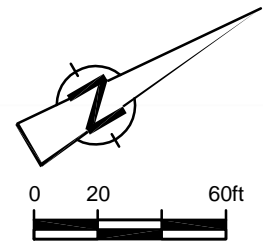


figure 1  
 SITE WORKZONE LAYOUT MAP  
 RRG CLAYTON CHEMICAL  
 Sauget, Illinois



## APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR OCTOBER 30 – NOVEMBER 3, 2006



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
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## MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Marcia R. Sivek/lg/60 DATE: November 30, 2006

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
G. Daley

RE: **Weekly Summary Of Site Activities For October 30 - November 3, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the forty-eighth week (the period October 30 through November 3, 2006) is presented below.

Date	Tasks	Activity
October 30, 2006	Mobilization Activities	Brandenburg Industrial Service Company (BISCo), and Conestoga-Rovers & Associates (CRA) personnel mobilized to the Site
	Project Coordination	START Bob Hill and IEPA Mike Grant were present on Site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning/Removal	No activity. CRA continue discussions with Veolia regarding scheduling the removal of the G8 materials from the Site
	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity

Date	Tasks	Activity
October 30, 2006	Miscellaneous	CRA received the analytical results for the samples collected from the material discovered during the investigation of the EZ 4 loading dock
October 31, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was not present on Site. The Respondents submitted Status Report # 12 to U.S. EPA via e-mail. The Respondents/CRA submitted a notification letter to OSC Turner informing him of the intention to backfill select excavations at the Site beginning on November 7, 2006
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning/Removal	No activity. CRA continue discussions with Veolia regarding scheduling the removal of the G8 materials from the Site
	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date, roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity
November 1, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present on Site to observe Site activities. OSC Kevin Turner contacted The Respondents via telephone to request a status update for the proposed landfill cover design documentation. The Respondents told OSC Turner that the documents would be provided by November 3, 2006
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning/Removal	No activity. CRA continue discussions with Veolia regarding scheduling the removal of the G8 materials from the Site

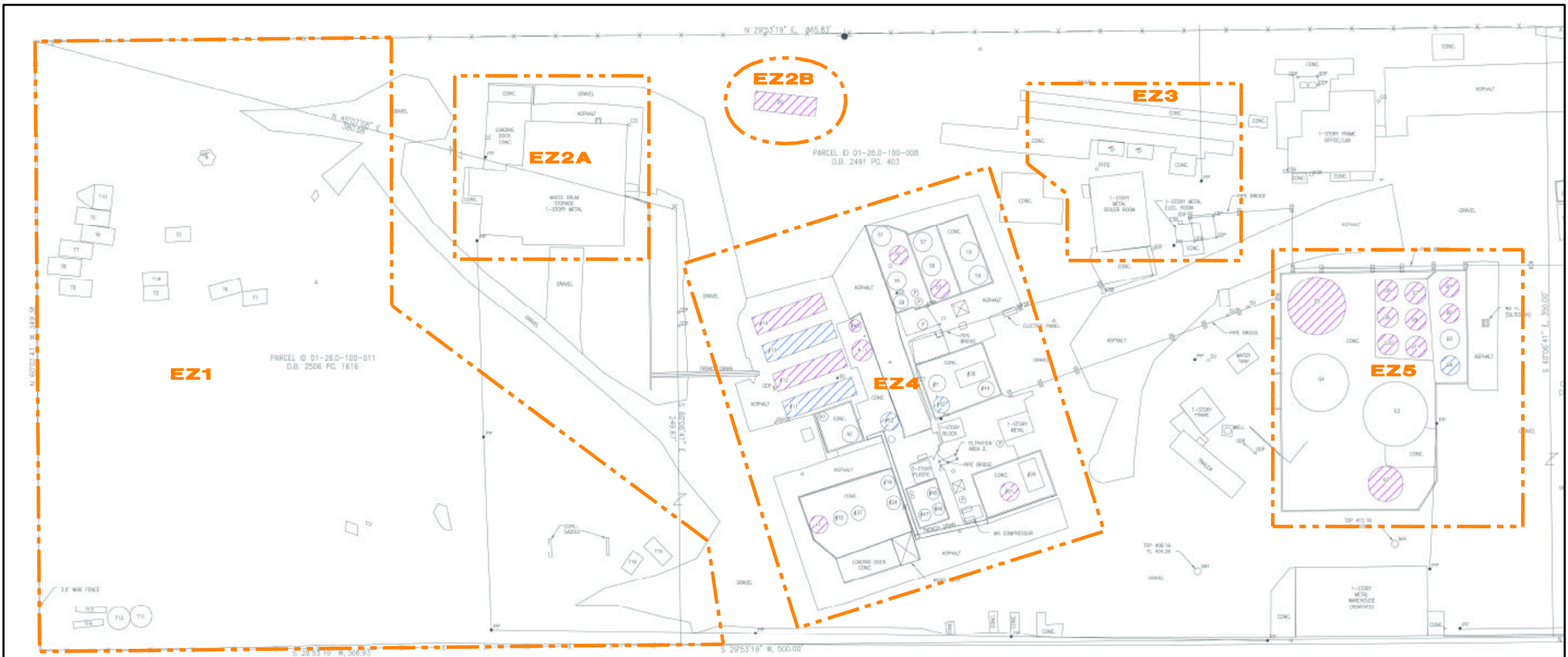


Date	Tasks	Activity
November 1, 2006	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity
November 2, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was present on site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning/Removal	No activity. CRA continue discussions with Veolia regarding scheduling the removal of the G8 materials from the Site
	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	Juneau Surveyors and Engineers mobilized on Site to collect survey data for the various Site features before the start of backfilling activities
November 3, 2006	Mobilization Activities	BISCo and CRA personnel demobilized from the Site
	Project Coordination	START Bob Hill was present on site to observe Site activities. The Respondents informed U.S. EPA via e-mail of the intent to begin chemical oxidation of the mixed RCRA/TSCA soils beginning on November 16, 2006. The Respondents also submitted the proposed landfill cover design and supporting information to U.S. EPA and IEPA via e-mail
	Site Preparation	No activity

<b>Date</b>	<b>Tasks</b>	<b>Activity</b>
November 3, 2006	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning/Removal	No activity. CRA continue discussions with Veolia regarding scheduling the removal of the G8 materials from the Site
	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
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	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), Marcia Sivek (312-402-1776) or Phil Harvey (773-380-9246) for clarification.

Attachment



**LEGEND**

CSB	CABLE SERVICE BOX	PP	POWER POLE
CO	CLEANOUT	GW	GUY WIRE
ESB	ELECTRIC SERVICE BOX	PBF	PIPE BRIDGE FOUNDATION
F	FAUCET	SV	SEWER VENT
FH	FIRE HYDRANT	WMH	WATER MANHOLE
GD	GAS DRIP	SV	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GV	GAS VALVE	TW	TANKS WITH "WEeping"
GP	GUIDEPOST	TSR	TANKS WITH SOLIDS REMAINING
LS	LIGHT STANDARD		
M	MAILBOX		
S	SIGN		
MH	MANHOLE		
OP	OLD IRON PIPE		

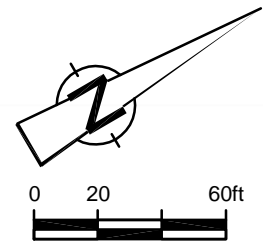


figure 1  
 SITE WORKZONE LAYOUT MAP  
 RRG CLAYTON CHEMICAL  
 Sauget, Illinois



## APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR NOVEMBER 6 – 10, 2006



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
Telephone: (773) 380-9933 Fax: (773) 380-6421  
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## MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/61 DATE: November 30, 2006

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
G. Daley

RE: **Weekly Summary Of Site Activities For November 6 - 10, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the forty- ninth week (the period November 6 through November 10, 2006) is presented below.

Date	Tasks	Activity
Nov. 6, 2006	Mobilization Activities	Brandenburg Industrial Service Company (BISCo), and Conestoga-Rovers & Associates (CRA) personnel mobilized to the Site for backfill activities
	Project Coordination	No on site START presence on Site. START Bob Hill was contacted by phone and informed of the planned activities, but said he was going to be out of town until Thursday. The Respondents were contacted by OSC Turner in response to the November 3, 2006 Notification Letter informing U.S. EPA of the intention to begin chemical oxidation activities for stockpiles # 2, # 4/4B and # 5C on or after November 16, 2006. OSC Turner asked for and was given a status update on the EZ 4 (soil results are non-haz, sludge haz for PCE and TCE) and Drum Building loading docks
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06

Date	Tasks	Activity
Nov. 6, 2006	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No onsite activity. BISCo confirmed delivery of backfill starting on 11/07/06
	Miscellaneous	No activity
Nov. 7, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence on Site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	BISCo received 26 loads (roughly 693 tons) of Aggline (backfill material) for deployment into the TP-44 excavation. Backfilling of excavation was 95% completed by the end of the day
	Miscellaneous	No activity
Nov. 8, 2006	Mobilization Activities	No activity
	Project Coordination	No START presence on Site. IEPA Mike Grant and John Senjan were onsite to observe Site activities. The Respondents provided OSC Turner and IEPA Grant with the analytical results from the EZ 4 loading dock samples
	Site Preparation	No activity

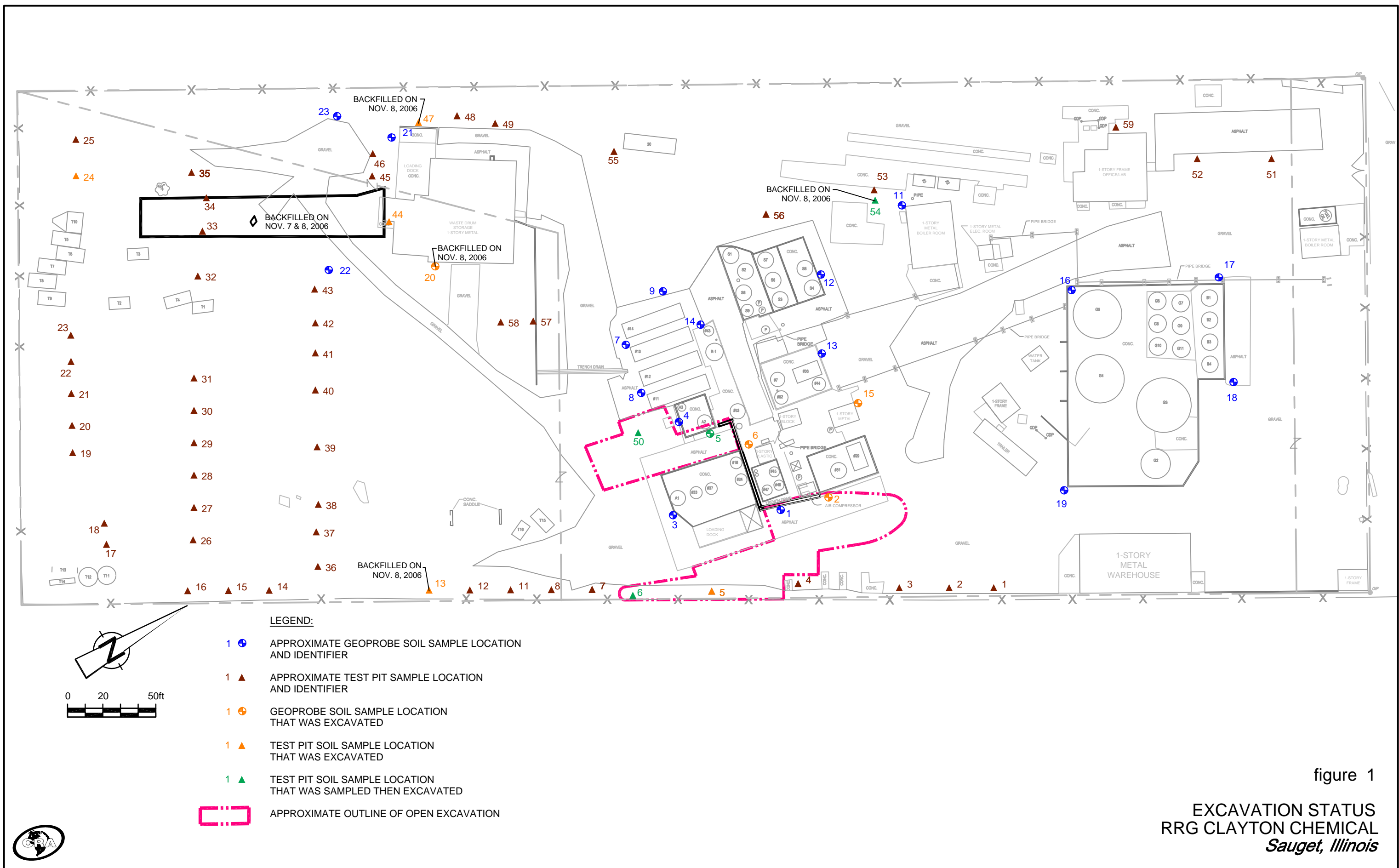
Date	Tasks	Activity
Nov. 8, 2006	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the loading logistics and disposal of the contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	BISCo received 17 loads (roughly 452 tons) of Aggline. Backfilling of TP-44 excavation was completed along with TP-13, TP-47, TP-54, and GP-20 excavations. BISCo also filled in the TP-24/TP-25 depression. 6 loads of Aggline were staged adjacent to the stockpile # 3 depression for future use
	Miscellaneous	No activity
Nov. 9, 2006	Mobilization Activities	No activity
	Project Coordination	No on Site START presence. The Respondents were informed by OSC Turner that no chemical oxidation activities were to proceed until an investigation of the Drum Building loading dock had been completed. The Respondents continued to draft the Work Plan Amendment that will address the management of the mixed RCRA/TSCA soils
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	Disposal of the G8 roll off boxes and drums was scheduled with Veolia for the week of 11/16/06 and for 11/10/06, respectively. BISCo demolished the concrete saddles from tanks 2 and 3
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06

Date	Tasks	Activity
Nov. 9, 2006	Soil Sampling/Excavation	BISCo backfilled the stockpile # 3 depression
	Miscellaneous	BISCo backfilled the pit from the former Boiler building
Nov. 10, 2006	Mobilization Activities	BISCo and CRA personnel demobilized from the Site
	Project Coordination	START Bob Hill was present on site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	14 55-gallon drums with impacted stormwater runoff from tank G8 were removed from the Site by Veolia for disposal at the Veolia Port Arthur, TX incinerator
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), Marcia Sivek (312-402-1776) or Phil Harvey (773-380-9246) for clarification.

Attachment





## APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR NOVEMBER 13 – 18, 2006



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
Telephone: (773) 380-9933 Fax: (773) 380-6421  
www.CRAworld.com

## MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/62 DATE: November 30, 2006

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
G. Daley

RE: **Weekly Summary Of Site Activities For November 13 - 18, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the fiftieth week (the period November 13 through November 18, 2006) is presented below.

Date	Tasks	Activity
Nov. 13, 2006	Mobilization Activities	Brandenburg Industrial Service Company (BISCo), and Conestoga-Rovers & Associates (CRA) personnel mobilized to the Site
	Project Coordination	No on Site START presence. The Respondents contacted U.S. EPA Thomas Turner regarding the requested investigation of the Waste Drum Storage (Drum)Building loading dock
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the disposal of the solid contents of tank G8
	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site

Date	Tasks	Activity
Nov. 13, 2006	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No onsite activity
	Miscellaneous	No activity
Nov. 14, 2006	Mobilization Activities	Grossman Steel delivered a roll box for the collection of scrap steel remaining on site
	Project Coordination	No on site START presence. The Respondents submitted analytical data to U.S. EPA in support of the position that the Drum Building loading dock was differently situated from the EZ 4 loading dock
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the disposal of the solid contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	J.C. Hauling Company hauled five truck loads of concrete for disposal at Surmeir and Surmeir Aggregate Recycling Center in Mascoutah, IL
Nov. 15, 2006	Mobilization Activities	No activity
	Project Coordination	No on site START presence. START Bob Hill contacted CRA via telephone with an update on the backfill status for GP-15, specifically that OSC Turner says not to backfill the excavation. The Respondents were informed that U.S. EPA had granted approval to begin the chemical oxidation processing of the mixed RCRA/TSCA soils at the Site beginning on November 16, 2006
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06

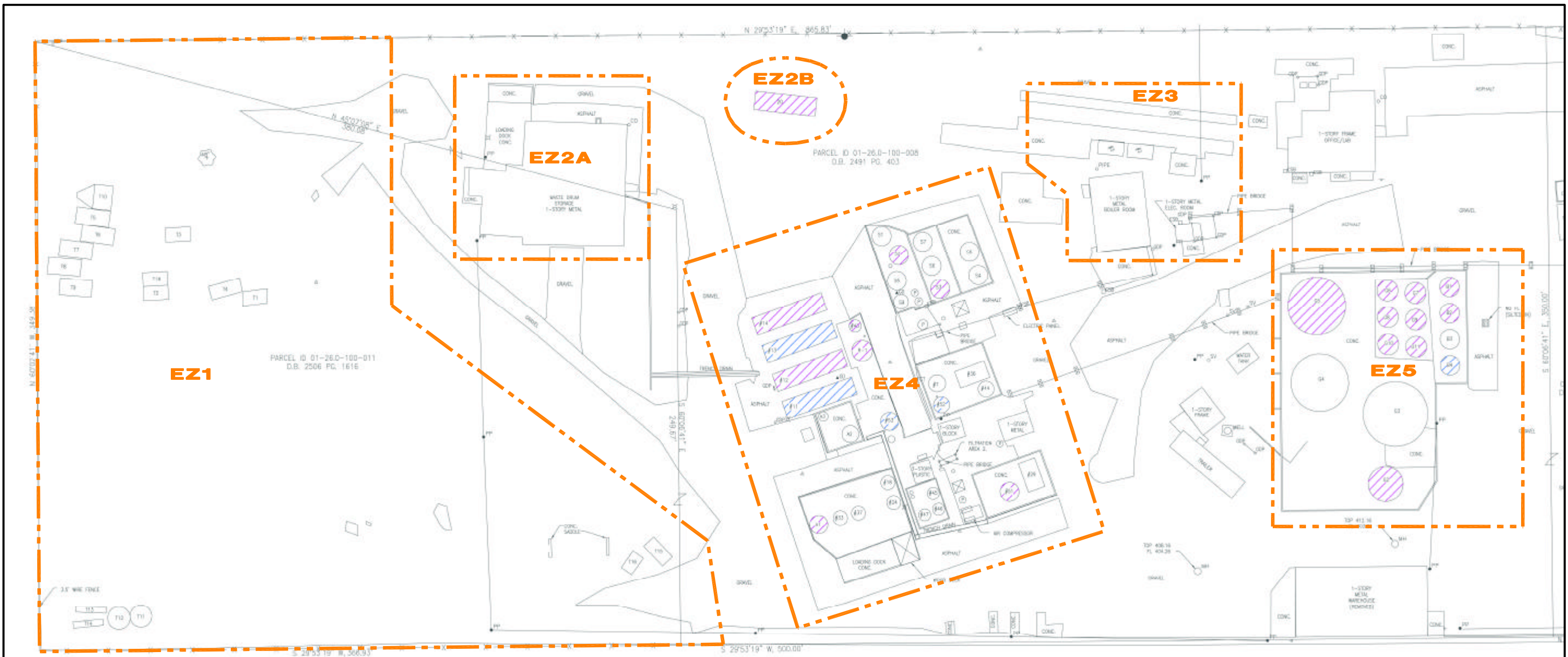
Date	Tasks	Activity
Nov. 15, 2006	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the disposal of the solid contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	Weather conditions throughout 11/15/06, as well as the projected weather conditions for 11/16/06, called for windy conditions, which were not compatible with the anticipated soil treatment protocol (addition of granular potassium permanganate). After consulting with EQ/RP, CRA determined that postponing the start of the chemical oxidation phase until 11/20/06 was the most practical course of action to avoid a situation where reagent cloud(s) who migrate offsite. Per NOAA archived web site data, the minimum wind speed during daylight hours was 10 mph with maximum gusts of 36 mph
	Miscellaneous	No activity
Nov. 16, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was on Site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the disposal of the solid contents of tank G8
	Drum Characterization/Disposal	BISCo relabeled several of the remaining drums to facilitate offsite disposal and relocated the drums from the Drum Building to the EZ 5 Work Zone. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06

Date	Tasks	Activity
Nov. 16, 2006	Soil Sampling/Excavation	BISCo began staging the assumed work area in preparation for the future activity. Per the weather forecast from 11/15/06, weather conditions included windy conditions (minimum wind speed of 16 mph, gusts up to 32 mph from the NOAA web site) throughout the day
	Miscellaneous	BISCo performed miscellaneous clean up activities at the Drum Building
Nov. 17, 2006	Mobilization Activities	BISCo and CRA personnel demobilized from the Site
	Project Coordination	No START presence on site
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the disposal of the solid contents of tank G8
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity
Nov. 18, 2006	Mobilization Activities	No activity
	Project Coordination	CRA submitted documentation to IEPA to demonstrate that no emission control equipment would be needed for the chemical oxidation process to avoid producing volatile emissions above the 25 tons per year threshold limit. U.S. EPA was also provided with this information
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity
	Drum Characterization/Disposal	No activity

<b>Date</b>	<b>Tasks</b>	<b>Activity</b>
Nov. 18, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on 03/14/06
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), Marcia Sivek (312-402-1776) or Phil Harvey (773-380-9246) for clarification.

Attachment



**LEGEND**

CABLE SERVICE BOX	POWER POLE
CLEANOUT	GUY WIRE
ELECTRIC SERVICE BOX	PIPE BRIDGE FOUNDATION
FAUCET	SEWER VENT
FIRE HYDRANT	WATER MANHOLE
GAS DRIP	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GAS VALVE	TANKS WITH "WEEPING"
GUIDEPOST	TANKS WITH SOLIDS REMAINING
LIGHT STANDARD	
MAILBOX	
SIGN	
MANHOLE	
OLD IRON PIPE	

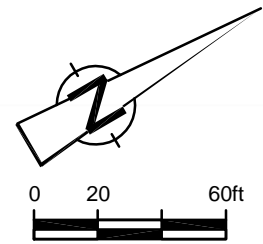


figure 1  
 SITE WORKZONE LAYOUT MAP  
 RRG CLAYTON CHEMICAL  
 Sauget, Illinois





## APPENDIX E

WEEKLY SUMMARY OF SITE ACTIVITIES FOR NOVEMBER 20 – 24, 2006



**CONESTOGA-ROVERS  
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631  
Telephone: (773) 380-9933 Fax: (773) 380-6421  
www.CRAworld.com

## MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/--/-- DATE: November 30, 2006

C.C.: Sharon Newlon  
P. Harvey  
R. Shepherd  
B. Schloessler  
M. Sivek

RE: **Weekly Summary Of Site Activities For November 20 - 24, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the fifty-first week (the period November 20 through November 24, 2006) is presented below.

Date	Tasks	Activity
Nov. 20, 2006	Mobilization Activities	Brandenburg Industrial Service Company (BISCo), Conestoga-Rovers & Associates (CRA), and Environmental Quality/Resolution Partners (EQ/RP) personnel mobilized to the Site. 44 35-gallon drums of potassium permanganate (KMnO <sub>4</sub> ) were delivered to the Site to be used during the chemical oxidation process
	Project Coordination	START Bob Hill was on Site to observe Site activities. IEPA Mike Grant and John Senjan were on Site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the disposal of the solid contents of tank G8
	Drum Characterization/Disposal	No activity. CRA and BISCo continued discussions with Veolia regarding disposal options for miscellaneous drums on Site

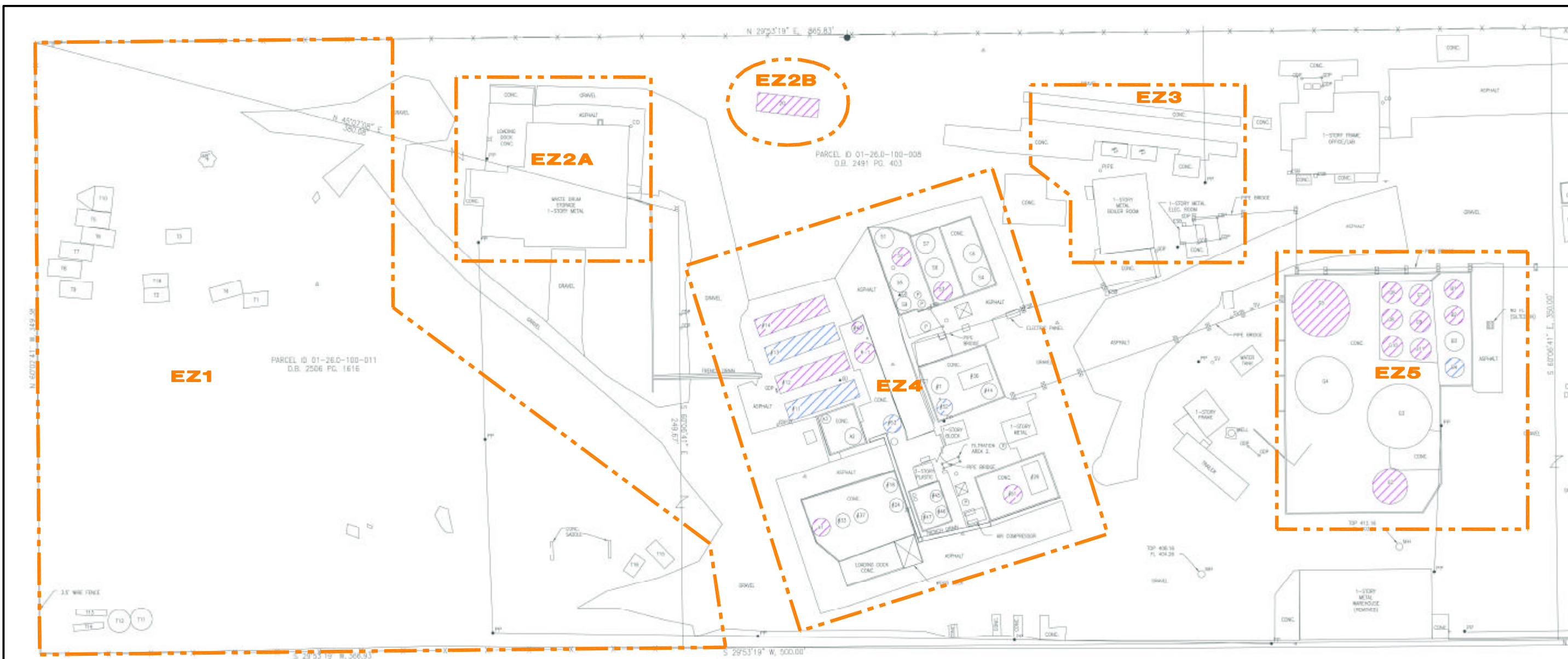
Date	Tasks	Activity
Nov. 20, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo and EQ/RP processed 8 batches (roughly 165 tons) of soils from stockpile # 5C and the relocated portions of stockpiles # 4/4B
	Miscellaneous	No activity
Nov. 21, 2006	Mobilization Activities	No activity
	Project Coordination	START Bob Hill was on Site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the disposal of the solid contents of tank G8 and the disposal of the drummed contents of tank 43
	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo and EQ/RP processed 10 batches (roughly 250 tons) of soils from the relocated portions of stockpiles # 4/4B and stockpile # 2 (90% processed)
	Miscellaneous	No activity
Nov. 22, 2006	Mobilization Activities	BISCo, CRA and EQ/RP personnel demobilized from the Site for the Thanksgiving holiday
	Project Coordination	START Bob Hill was on Site to observe Site activities. IEPA Mike Grant was on Site to observe Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity. CRA continued discussions with Veolia regarding the disposal of the solid contents of tank G8 and the disposal of the drummed contents of tank 43

Date	Tasks	Activity
Nov. 22, 2006	Drum Characterization/Disposal	No activity. CRA continued discussions with Veolia regarding disposal options for miscellaneous drums on Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	BISCo and EQ/RP processed 10 batches (roughly 270 tons) of soils from the stockpile # 2 (remaining 10% processed) and the original stockpile # 4/4B (40% of soils processed, soils are more dense than previously processed soils)
	Miscellaneous	No activity
Nov. 23, 2006	Mobilization Activities	No activity due to Thanksgiving holiday
	Project Coordination	No activity due to Thanksgiving holiday
	Site Preparation	No activity due to Thanksgiving holiday
	Asbestos Abatement	No activity due to Thanksgiving holiday. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity due to Thanksgiving holiday
	Drum Characterization/Disposal	No activity due to Thanksgiving holiday
	Piping Draining/Disconnection	No activity due to Thanksgiving holiday. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity due to Thanksgiving holiday. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity due to Thanksgiving holiday
	Miscellaneous	No activity due to Thanksgiving holiday
Nov. 24, 2006	Mobilization Activities	No activity due to Thanksgiving holiday
	Project Coordination	No activity due to Thanksgiving holiday
	Site Preparation	No activity due to Thanksgiving holiday
	Asbestos Abatement	No activity due to Thanksgiving holiday. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off-Site on 02/08/06
	AST Sampling/Cleaning Removal	No activity due to Thanksgiving holiday
	Drum Characterization/Disposal	No activity due to Thanksgiving holiday

<b>Date</b>	<b>Tasks</b>	<b>Activity</b>
Nov. 24, 2006	Piping Draining/Disconnection	No activity due to Thanksgiving holiday. To date roughly 3,920' of piping have been removed and shipped off-Site
	Process Equipment Decommissioning	No activity due to Thanksgiving holiday. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity due to Thanksgiving holiday
	Miscellaneous	No activity due to Thanksgiving holiday

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (312-402-1776) or Phil Harvey (773-380-9933) for clarification.

Attachment



LEGEND			
	CABLE SERVICE BOX		POWER POLE
	CLEANOUT		GUY WIRE
	ELECTRIC SERVICE BOX		PIPE BRIDGE FOUNDATION
	FAUCET		SEWER VENT
	FIRE HYDRANT		WATER MANHOLE
	GAS DRIP		SMALL VAT POTS IN PROCESS AREA (<5'x5')
	GAS VALVE		TANKS WITH "WEEPING"
	GUIDEPOST		TANKS WITH SOLIDS REMAINING
	LIGHT STANDARD		
	MAILBOX		
	SIGN		
	MANHOLE		
	OLD IRON PIPE		

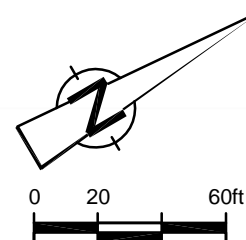


figure 1

SITE WORKZONE LAYOUT MAP  
RRG CLAYTON CHEMICAL  
Sauget, Illinois



## APPENDIX F

### SUMMARY TABLE OF AND SAMPLE KEY FOR EQUIPMENT DECONTAMINATION CONFIRMATORY SAMPLES

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE SAUGET, ST. CLAIR COUNTY, ILLINOIS											
G8 POST-LOADOUT EQUIPMENT DECONTAMINATION WIPE SAMPLE ANALYTICAL RESULTS											
	Reporting Limit (µg/wipe)										
Sample Date		10/19/2006	10/19/2006	10/19/2006	10/19/2006	10/19/2006	10/19/2006	10/19/2006	10/19/2006	10/19/2006	10/19/2006
Sample Time		1312	1313	1310	1315	1316	1324	1317	1318	1320	1322
Sample ID		WIPE-101906-MS-001	WIPE-101906-MS-002	WIPE-101906-MS-003	WIPE-101906-MS-004	WIPE-101906-MS-005	WIPE-101906-MS-006	WIPE-101906-MS-007	WIPE-101906-MS-008	WIPE-101906-MS-009	WIPE-101906-MS-010
Sample Type		Wipe	Wipe	Wipe	Wipe	Wipe	Wipe	Wipe	Wipe	Wipe	Wipe
FID Reading		NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
PCBs											
Aroclor 1016	1.0	2.4	5.0	1.0	3.2	ND	3.2	1.7	2.3	2	4.7
Aroclor 1221	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1232	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1242	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1248	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1254	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Aroclor 1260	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
TOTAL		2.40	5.00	1.00	3.20	N/A	3.20	1.70	2.30	2.00	4.70

Wipe Area = 1 square foot  
= 929.03 square centimeters

Maximum concentration =  $5.0 \mu\text{g}/929.0 \text{ cm}^2$   
=  $(5.0/9.29)\mu\text{g}/100 \text{ cm}^2$   
=  $0.54\mu\text{g}/100 \text{ cm}^2$

Per Title 40 of the Code of Federal Regulations 40 CFR), Part 761.79.b.3, the decontamination standard for non-porous surfaces for unrestricted use is  $10 \mu\text{g}/100 \text{ cm}^2$

Notes:

1) ND = Analyte Not Detected

2) N/A = Not Applicable



**RRG/CLAYTON CHEMICAL SITE  
SAUGET, ST. CLAIR COUNTY, ILLINOIS**

**G8 EQUIPMENT DECONTAMINATION FIELD SAMPLE KEY**

<b>Date</b>	<b>Time</b>	<b>Sample Identification</b>	<b>Location</b>	<b>PID Readings (ppm)</b>	<b>Comments</b>
<b>Decontamination Wipe Samples</b>					
10/19/2006	1312	WIPE-101906-MS-001	Inside Bucket Left Wall	N/A	Wiped area of approximately 1 ft <sup>2</sup>
10/19/2006	1313	WIPE-101906-MS-002	Inside Bucket Right Wall	N/A	Wiped area of approximately 1 ft <sup>2</sup>
10/19/2006	1310	WIPE-101906-MS-003	Inside Bucket Base	N/A	Wiped area of approximately 1 ft <sup>2</sup>
10/19/2006	1315	WIPE-101906-MS-004	Outside Bucket Wall Left	N/A	Wiped area of approximately 1 ft <sup>2</sup>
10/19/2006	1316	WIPE-101906-MS-005	Outside Bucket Wall Right	N/A	Wiped area of approximately 1 ft <sup>2</sup>
10/19/2006	1324	WIPE-101906-MS-006	Outside Bottom	N/A	Wiped area of approximately 1 ft <sup>2</sup>
10/19/2006	1317	WIPE-101906-MS-007	Stick-Right Side	N/A	Wiped area of approximately 1 ft <sup>2</sup>
10/19/2006	1318	WIPE-101906-MS-008	Stick-Left Side	N/A	Wiped area of approximately 1 ft <sup>2</sup>
10/19/2006	1320	WIPE-101906-MS-009	Stick-Front (toward operator)	N/A	Wiped area of approximately 1 ft <sup>2</sup>
10/19/2006	1322	WIPE-101906-MS-010	Stick-Back	N/A	Wiped area of approximately 1 ft <sup>2</sup>

## APPENDIX G

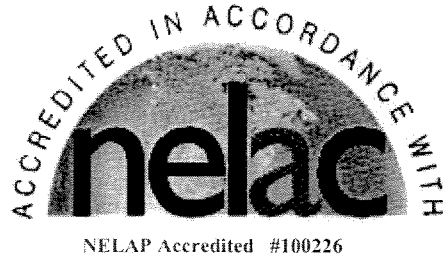
### ANALYTICAL RESULTS OF EQUIPMENT DECONTAMINATION CONFIRMATORY SAMPLES

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004  
FAX: 618-344-1005

October 23, 2006

Marcia Sivek  
Conestoga-Rovers & Associates  
8615 West Bryn Mawr Avenue  
Chicago, IL 60631-3501  
TEL: (312)-402-1776  
FAX: (773) 380-6421



RE: 42192

OrderNo. 06100587

Dear Marcia Sivek:

TEKLAB, INC received 10 samples on 10/19/2006 2:15:00 PM for the analysis presented in the following report. A list of report contents can be found on the following page.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest as directed on the chain of custody. IL ELAP and NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

A handwritten signature in cursive script that reads "Heather A. Barnes".

Heather A. Barnes  
Project Manager  
(618)344-1004 ex.20

---

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Conestoga-Rovers & Associates  
Project: 42192  
LabOrder: 06100587  
Report Date: October 23, 2006

## REPORT CONTENTS

---

**This reporting package includes the following:**

Analysis Results ( this document ) . . . . .	13	pages
Chain of Custody . . . . .	1	pages
Sample Receipt Checklist . . . . .	1	pages
Associated Information . . . . .	NA	pages
Sample Summary . . . . .	NA	pages
Dates Report . . . . .	NA	pages
QC Report . . . . .	NA	pages
Sub Contracted Lab Report . . . . .	NA	pages
MDL Report . . . . .	NA	pages

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Conestoga-Rovers & Associates

Project: 42192

LabOrder: 06100587

Report Date: October 23, 2006

## CASE NARRATIVE

Cooler Receipt Temp 16.8 °C

### Qualifiers

**DF** - Dilution Factor

**RL** - Reporting Limit

**ND** - Not Detected at the Reporting Limit

**Surr** - Surrogate Standard added by lab

**TNTC** - Too numerous to count

**IDPH** - Illinois Department of Public Health

**B** - Analyte detected in the associated Method Blank

**J** - Analyte detected below reporting limits

**R** - RPD outside accepted recovery limits

**S** - Spike Recovery outside accepted recovery limits

**X** - Value exceeds Maximum Contaminant Level

**NELAP** - IL ELAP and NELAP Accredited Field of Testing

**E** - Value above quantitation range

**H** - Holding time exceeded

**D** - Diluted out of sample

**MI** - Matrix interference

**DNI** Did Not Ignite

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-001

**Lab ID:** 06100587-001

**Collection Date:** 10/19/2006 1:12:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		2.4	µg/wipe	1	10/20/2006 2:55:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 2:55:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 2:55:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 2:55:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 2:55:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 2:55:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 2:55:00 PM	HE
Surr: Decachlorobiphenyl		10-224		71.2	%REC	1	10/20/2006 2:55:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		61.9	%REC	1	10/20/2006 2:55:00 PM	HE

Sample Narrative

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-002

**Lab ID:** 06100587-002

**Collection Date:** 10/19/2006 1:13:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		5.0	µg/wipe	1	10/20/2006 3:12:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:12:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:12:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:12:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:12:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:12:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:12:00 PM	HE
Surr: Decachlorobiphenyl		10-224		77.2	%REC	1	10/20/2006 3:12:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		61.2	%REC	1	10/20/2006 3:12:00 PM	HE

Sample Narrative

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-003

**Lab ID:** 06100587-003

**Collection Date:** 10/19/2006 1:10:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		1.0	µg/wipe	1	10/20/2006 3:29:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:29:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:29:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:29:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:29:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:29:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:29:00 PM	HE
Surr: Decachlorobiphenyl		10-224		78.9	%REC	1	10/20/2006 3:29:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		71.2	%REC	1	10/20/2006 3:29:00 PM	HE

Sample Narrative



ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-004

**Lab ID:** 06100587-004

**Collection Date:** 10/19/2006 1:15:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		3.2	µg/wipe	1	10/20/2006 3:46:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:46:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:46:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:46:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:46:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:46:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 3:46:00 PM	HE
Surr: Decachlorobiphenyl		10-224		79.1	%REC	1	10/20/2006 3:46:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		64.5	%REC	1	10/20/2006 3:46:00 PM	HE

### Sample Narrative

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-005

**Lab ID:** 06100587-005

**Collection Date:** 10/19/2006 1:16:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:03:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:03:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:03:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:03:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:03:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:03:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:03:00 PM	HE
Surr: Decachlorobiphenyl		10-224		84.7	%REC	1	10/20/2006 4:03:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		80.9	%REC	1	10/20/2006 4:03:00 PM	HE

### Sample Narrative

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-006

**Lab ID:** 06100587-006

**Collection Date:** 10/19/2006 1:24:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		3.2	µg/wipe	1	10/20/2006 4:19:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:19:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:19:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:19:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:19:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:19:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:19:00 PM	HE
Surr: Decachlorobiphenyl		10-224		77.3	%REC	1	10/20/2006 4:19:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		62.7	%REC	1	10/20/2006 4:19:00 PM	HE

Sample Narrative

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-007

**Lab ID:** 06100587-007

**Collection Date:** 10/19/2006 1:17:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		1.7	µg/wipe	1	10/20/2006 4:36:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:36:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:36:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:36:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:36:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:36:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:36:00 PM	HE
Surr: Decachlorobiphenyl		10-224		75.9	%REC	1	10/20/2006 4:36:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		74.5	%REC	1	10/20/2006 4:36:00 PM	HE

Sample Narrative

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-008

**Lab ID:** 06100587-008

**Collection Date:** 10/19/2006 1:18:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		2.3	µg/wipe	1	10/20/2006 4:53:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:53:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:53:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:53:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:53:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:53:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 4:53:00 PM	HE
Surr: Decachlorobiphenyl		10-224		82.2	%REC	1	10/20/2006 4:53:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		78.0	%REC	1	10/20/2006 4:53:00 PM	HE

Sample Narrative

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-009

**Lab ID:** 06100587-009

**Collection Date:** 10/19/2006 1:20:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		2.0	µg/wipe	1	10/20/2006 5:10:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:10:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:10:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:10:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:10:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:10:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:10:00 PM	HE
Surr: Decachlorobiphenyl		10-224		81.4	%REC	1	10/20/2006 5:10:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		77.2	%REC	1	10/20/2006 5:10:00 PM	HE

Sample Narrative

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**Client Project:** 42192

**WorkOrder:** 06100587

**Client Sample ID:** Wipe-101906-MS-010

**Lab ID:** 06100587-010

**Collection Date:** 10/19/2006 1:22:00 PM

**Report Date:** 23-Oct-06

**Matrix:** WIPE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	1.0		4.7	µg/wipe	1	10/20/2006 5:27:00 PM	HE
Aroclor 1221	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:27:00 PM	HE
Aroclor 1232	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:27:00 PM	HE
Aroclor 1242	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:27:00 PM	HE
Aroclor 1248	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:27:00 PM	HE
Aroclor 1254	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:27:00 PM	HE
Aroclor 1260	NELAP	1.0		ND	µg/wipe	1	10/20/2006 5:27:00 PM	HE
Surr: Decachlorobiphenyl		10-224		81.6	%REC	1	10/20/2006 5:27:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-189		70.5	%REC	1	10/20/2006 5:27:00 PM	HE

Sample Narrative

## APPENDIX H

### SUMMARY TABLE OF AND SAMPLE KEY FOR LOADING DOCK MATERIAL CHARACTERIZATION SAMPLES



<b>RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE</b> <b>SOLIDS REMOVAL ACTION ANALYTICAL RESULTS</b> <b>LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS</b>			
	<b>RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs</b>		
<b>Sample Date</b>		<b>10/17/2006</b>	<b>10/17/2006</b>
<b>Sample Time</b>		<b>1101</b>	<b>1545</b>
<b>Sample ID</b>		<b>D-101706-MS-001</b>	<b>S-101706-MS-029</b>
<b>No. of Sample Aliquots</b>		<b>1</b>	<b>8</b>
<b>Parameter</b>			
<b>TCLP Metals</b>			
Arsenic	<b>5.0</b>	<0.025	<0.025
Barium	<b>100.0</b>	0.404	0.293
Cadmium	<b>1.0</b>	0.0084	0.0585
Chromium	<b>5.0</b>	0.837	0.0514
Lead	<b>5.0</b>	0.668	0.228
Selenium	<b>1.0</b>	<0.0500	<0.0500
Silver	<b>5.0</b>	<0.0100	<0.0100
Mercury	<b>0.2</b>	<0.0002	<0.0002
<b>Total Metals</b>			
Aluminum	-	3,530	4,800
Antimony	82	3.91	2.52
Arsenic	61	<3.13	2.3
Barium	14,000	6,630	101
Beryllium	410	0.28	0.76
Cadmium	200	0.23	8.07
Calcium	-	17,100	45,500
Chromium	420	255	75.6
Cobalt	12,000	21.7	4.05
Copper	8,200	9.33	34.5
Iron	-	16,300	14,800
Lead	400	<b>1,230</b>	270

<b>RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE</b> <b>SOLIDS REMOVAL ACTION ANALYTICAL RESULTS</b> <b>LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS</b>			
	<b>RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs</b>		
<b>Sample Date</b>		<b>10/17/2006</b>	<b>10/17/2006</b>
<b>Sample Time</b>		<b>1101</b>	<b>1545</b>
<b>Sample ID</b>		<b>D-101706-MS-001</b>	<b>S-101706-MS-029</b>
<b>No. of Sample Aliquots</b>		<b>1</b>	<b>8</b>
<b>Parameter</b>			
Magnesium	-	660	1,410
Manganese	8,700	58.4	82.2
Mercury	61	0.489	0.459
Nickel	4,100	5.7	16.3
Potassium	-	438	1,070
Selenium	1,000	<5.01	<4.00
Silver	1,000	2.87	1.65
Sodium	-	185	436
Thallium	160	<6.26	<5.00
Vanadium	1,400	5.03	35
Zinc	61,000	51.4	148
<b>PCBs</b>			
Aroclor 1016		ND	8.25
Aroclor 1221		ND	ND
Aroclor 1232		ND	ND
Aroclor 1242		ND	ND
Aroclor 1248		ND	ND
Aroclor 1254		ND	ND
Aroclor 1260		ND	ND
<b>Total</b>	<b>50.0</b>	<b>NA</b>	<b>8.25</b>

<b>RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE</b> <b>SOLIDS REMOVAL ACTION ANALYTICAL RESULTS</b> <b>LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS</b>			
	RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs		
Sample Date		10/17/2006	10/17/2006
Sample Time		1101	1545
Sample ID		D-101706-MS-001	S-101706-MS-029
No. of Sample Aliquots		1	8
Parameter			
<b>TCLP SEMIVOLATILE ORGANIC COMPOUNDS</b>			
2,4,5-Trichlorophenol	400.0	ND	ND
2,4,6-Trichlorophenol	2.0	ND	ND
2,4-Dinitrotoluene	0.13	ND	ND
Cresols, Total	200	0.052	ND
o-Cresol	200	0.052	ND
2-Methylphenol	200.0	NA	NA
3/4 Methylphenol	400.0	NA	NA
Hexachlorobenzene	0.13	ND	ND
Hexachlorobutadiene	0.5	ND	ND
Hexachloroethane	3.0	ND	ND
Nitrobenzene	2.0	ND	ND
Pentachlorophenol	100.0	0.052	ND
Pyridine	5.0	ND	ND
<b>TOTAL SEMIVOLATILE ORGANIC COMPOUNDS</b>			
Benzo(ghi)perylene	-	ND	ND
Anthracene	610,000	ND	ND
Carbazole	290	ND	ND
Di-n-butyl phthalate	2,300	ND	ND
Fluoranthene	82,000	ND	1
Pyrene	61,000	ND	ND

<b>RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE</b> <b>SOLIDS REMOVAL ACTION ANALYTICAL RESULTS</b> <b>LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS</b>			
	<b>RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs</b>		
<b>Sample Date</b>		<b>10/17/2006</b>	<b>10/17/2006</b>
<b>Sample Time</b>		<b>1101</b>	<b>1545</b>
<b>Sample ID</b>		<b>D-101706-MS-001</b>	<b>S-101706-MS-029</b>
<b>No. of Sample Aliquots</b>		<b>1</b>	<b>8</b>
<b>Parameter</b>			
Butyl benzyl phthalate	930	ND	ND
3,3'-Dichlorobenzidine	13	ND	ND
Benzo(a)anthracene	8.0	ND	ND
Chrysene	780	ND	ND
bis(2-Ethylhexyl)phthalate	410	334	7.76
Di-n-octyl phthalate	10,000	ND	ND
Benzo(b)fluoranthene	8.0	ND	ND
Benzo(k)fluoranthene	78	ND	ND
Benzo(a)pyrene	0.8	ND	ND
Indeno(1,2,3-cd)pyrene	8.0	ND	ND
Dibenz(a,h)anthracene	0.8	ND	ND
Acenaphthene	120,000	ND	ND
2,4-Dinitrophenol	410	ND	ND
4-Nitrophenol	-	ND	ND
Dibenzofuran	-	ND	ND
2,4-Dinitrotoluene	8.4	ND	ND
Diethyl phthalate	2,000	ND	ND
Fluorene	82,000	ND	ND
4-Chlorophenyl phenyl ether	-	ND	ND
4-Nitroaniline	-	ND	ND
4,6-Dinitro-2-methylphenol	-	ND	ND
N-Nitrosodiphenylamine	1,200	ND	ND

<b>RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE</b> <b>SOLIDS REMOVAL ACTION ANALYTICAL RESULTS</b> <b>LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS</b>			
	RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs		
Sample Date		10/17/2006	10/17/2006
Sample Time		1101	1545
Sample ID		D-101706-MS-001	S-101706-MS-029
No. of Sample Aliquots		1	8
Parameter			
4-Bromophenyl phenyl ether	-	ND	ND
Hexachlorobenzene	1.8	ND	ND
Atrazine	7,100	NA	NA
Pentachlorophenol	24	ND	ND
Phenanthrene	-	ND	0.72
Naphthalene	1.8	100	ND
4-Chloroaniline	820	ND	ND
Hexachlorobutadiene	-	ND	ND
Caprolactum	-	NA	NA
4-Chloro-3-methylphenol	-	ND	ND
2-Methylnaphthalene	-	ND	ND
Hexachlorocyclopentadiene	1.1	ND	ND
2,4,6-Trichlorophenol	390	ND	ND
2,4,5-Trichlorophenol	200,000	ND	ND
1,1'-Biphenyl	-	NA	NA
2-Chloronaphthalene	-	ND	ND
2-Nitroaniline	-	ND	ND
Dimethyl phthalate	-	ND	ND
2,6-Dinitrotoluene	8.4	ND	ND
Acenaphthylene	-	ND	ND
3-Nitroaniline	-	ND	ND
Benzaldehyde	-	NA	NA

<b>RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE</b> <b>SOLIDS REMOVAL ACTION ANALYTICAL RESULTS</b> <b>LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS</b>			
	RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs		
Sample Date		10/17/2006	10/17/2006
Sample Time		1101	1545
Sample ID		D-101706-MS-001	S-101706-MS-029
No. of Sample Aliquots		1	8
Parameter			
Phenol	120,000	ND	ND
bis(2-Chloroethyl)ether	0.47	ND	ND
2-Chlorophenol	10,000	ND	ND
2-Methylphenol	100,000	NA	NA
2,2'-oxybis(1-Chloropropane)	-	NA	NA
Acetophenone	-	NA	NA
N-nitrosodi-n-propylamine	0.8	ND	ND
Hexachloroethane	2,000	ND	ND
Nitrobenzene	9.4	ND	ND
Isophorone	4,600	ND	ND
2-Nitrophenol		ND	ND
2,4-Dimethylphenol	41,000	ND	ND
bis(2-Chloroethoxy)methane	-	NA	NA
2,4-Dichlorophenol	610	ND	ND
<b>TCLP VOLATILE ORGANIC COMPOUNDS</b>			
1,1-Dichloroethene	1.7	0.056	ND
1,2-Dichloroethane	0.5	0.11	ND
1,4-Dichlorobenzene	7.5	ND	ND
2-Butone		53.2	ND
Benzene	0.5	0.146	ND
Carbon Tetrachloride	0.5	ND	ND

<b>RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE</b> <b>SOLIDS REMOVAL ACTION ANALYTICAL RESULTS</b> <b>LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS</b>			
	<b>RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs</b>		
<b>Sample Date</b>		<b>10/17/2006</b>	<b>10/17/2006</b>
<b>Sample Time</b>		<b>1101</b>	<b>1545</b>
<b>Sample ID</b>		<b>D-101706-MS-001</b>	<b>S-101706-MS-029</b>
<b>No. of Sample Aliquots</b>		<b>1</b>	<b>8</b>
<b>Parameter</b>			
Chlorobenzene	<b>100.0</b>	0.12	ND
Chloroform	<b>6.0</b>	ND	ND
Methyl ethyl ketone	<b>200.0</b>	NA	NA
Tetrachloroethene	<b>0.7</b>	<b>2.54</b>	0.526
Trichloroethene	<b>0.5</b>	<b>7.04</b>	0.394
Vinyl chloride	<b>0.2</b>	ND	ND
<b>TOTAL VOLATILE ORGANIC COMPOUNDS</b>			
Acetone	<b>100,000</b>	ND	ND
Benzene	<b>1.6</b>	ND	ND
Bromodichloromethane	<b>92</b>	ND	ND
Bromoform	<b>100</b>	ND	ND
Bromomethane	<b>-</b>	ND	ND
2-Butanone (MEK)	<b>-</b>	1220	1220
Carbon disulfide	<b>9.00</b>	ND	ND
Carbon tetrachloride	<b>0.64</b>	ND	ND
Chlorobenzene	<b>1.30</b>	ND	ND
Chloroethane	<b>-</b>	ND	ND
Chloroform	<b>0.54</b>	ND	0.362
Chloromethane	<b>-</b>	ND	ND
Cyclohexane	<b>-</b>	NA	NA
Dibromochloromethane	<b>1,300</b>	ND	ND
1,2-Dibromo-3-chloro-propane	<b>0.11</b>	NA	NA

**RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE**  
**SOLIDS REMOVAL ACTION ANALYTICAL RESULTS**  
**LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS**

	RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs		
Sample Date		10/17/2006	10/17/2006
Sample Time		1101	1545
Sample ID		D-101706-MS-001	S-101706-MS-029
No. of Sample Aliquots		1	8
Parameter			
1,2-Dibromoethane	0.07	NA	NA
1,2-Dichlorobenzene	310	ND	ND
1,3-Dichlorobenzene	-	ND	ND
1,4-Dichlorobenzene	340	ND	ND
Dichlorodifluoromethane	-	NA	NA
1,1-Dichloroethane	130	524	524
1,2-Dichloroethane	0.70	ND	ND
cis-1,2-Dichloroethene	1,200	50.5	6.66
trans-1,2-Dichloroethene	3,100	ND	ND
1,1-Dichloroethene	300	ND	ND
1,2-Dichloropropane	0.50	ND	ND
cis-1,3-Dichloropropene	0.39	ND	ND
trans-1,3-Dichloropropene	0.39	ND	ND
Ethylbenzene	58	3110	0.791
2-Hexanone	-	ND	ND
Isopropylbenzene	-	NA	NA
Methyl acetate	-	NA	NA
Methylene chloride	24	1720	ND
Methylcyclohexane	-	NA	NA
4-Methyl-2-pentanone	-	2350	ND
Methyl tert-butyl ether	140	ND	ND



<b>RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE</b> <b>SOLIDS REMOVAL ACTION ANALYTICAL RESULTS</b> <b>LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS</b>			
	RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs		
Sample Date		10/17/2006	10/17/2006
Sample Time		1101	1545
Sample ID		D-101706-MS-001	S-101706-MS-029
No. of Sample Aliquots		1	8
Parameter			
Styrene	430	NA	NA
1,1,2,2-Tetrachloroethane	-	ND	ND
Tetrachloroethene	20	1060	83.9
Toluene	42	19,400	0.727
1,2,4-Trichlorobenzene	920	NA	NA
1,1,1-Trichloroethane	1,200	876	26.4
1,1,2-Trichloroethane	1,800	ND	ND
Trichloroethene	8.9	895	21.2
Trichlorofluoromethane	-	NA	NA
1,1,2-Trichloro-1,1,2-trifluoroethane	-	NA	NA
Vinyl chloride	1.1	ND	ND
Xylenes	320	14000	5.17
<b>TCCLP-PESTICIDES</b>			
Chlordane	0.003	ND	ND
Endrin	0.020	ND	ND
gamma-BHC	0.4	ND	ND
Heptachlor	0.008	ND	ND
Heptachlor epoxide	0.008	ND	ND
Methoxychlor	10.0	ND	ND
Toxaphene	0.5	ND	ND

<b>RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE</b> <b>SOLIDS REMOVAL ACTION ANALYTICAL RESULTS</b> <b>LOADING DOCK SOIL AND SLUDGE ANALYTICAL RESULTS</b>			
	<b>RCRA Toxic Concentration/TSCA Threshold/IEPA Industrial- Commercial SROs</b>		
Sample Date		10/17/2006	10/17/2006
Sample Time		1101	1545
Sample ID		D-101706-MS-001	S-101706-MS-029
No. of Sample Aliquots		1	8
Parameter			
<b>TCLP HERBICIDES</b>			
2,4,5-TP	<b>1.0</b>	ND	ND
2,4-D	<b>10.0</b>	ND	ND
<b>GENERAL CHEMISTRY</b>			
Reactive Cyanide		<4.69	<4.69
Reactive Sulfide		<9.4	<9.4
Phenolics		NA	NA
Paint Filter Test		NA	NA
pH		NA	NA
Ignitibility		NA	NA
Extractable Organic Halides		NA	NA
Percent Moisture		21.7	18

Notes:

1. All concentrations are reported in parts per million.
2. Analytical data shown is from samples collected during 2005-06 Removal Action efforts.
3. Analytical data shown is being evaluated against the RCRA Toxicity thresholds, TSCA threshold value, and IEPA Industrial-Commercial SROs.
4. Evaluation standards (column B) are bolded for emphasis.
5. A dash (-) in column B indicates that no evaluation threshold was found.
6. Bolded cells represent data that exceeded the applicable evaluation threshold value.
7. NA means data was not analyzed for.
8. Blank cells means data was neither requested nor reported.
9. ND means the analyte was not detected.

**RRG/CLAYTON CHEMICAL SITE  
SAUGET, ST. CLAIR COUNTY, ILLINOIS**

**LOADING DOCK SOIL AND SLUDGE CHARACTERIZATION FIELD SAMPLE KEY**

<b>Date</b>	<b>Time</b>	<b>Sample Identification</b>	<b>Location</b>	<b>Comments</b>
<b>Soil Characterization Samples</b>				
10/17/2006	1101	D-101706-MS-001	Loading Dock Area- EZ4	Sample from drum contents on north side of loading dock
10/17/2006	1545	S-101706-MS-029	Loading Dock Area- EZ4	Sample composite from 8 aliquots

## APPENDIX I

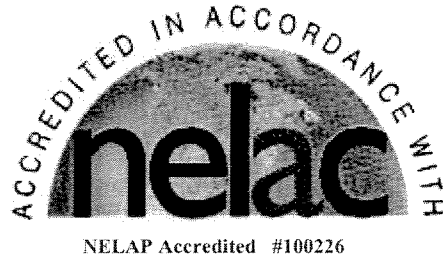
### ANALYTICAL RESULTS OF LOADING DOCK MATERIAL CHARACTERIZATION SAMPLES

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004  
FAX: 618-344-1005

October 31, 2006

Marcia Sivek  
Conestoga-Rovers & Associates  
8615 West Bryn Mawr Avenue  
Chicago, IL 60631-3501  
TEL: (312)-402-1776  
FAX: (773) 380-6421



RE: RRG/Clayton Chemical Soil Removal 42192-95

OrderNo. 06100516

Dear Marcia Sivek:

TEKLAB, INC received 3 samples on 10/17/2006 4:15:00 PM for the analysis presented in the following report. A list of report contents can be found on the following page.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest as directed on the chain of custody. IL ELAP and NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

A handwritten signature in black ink that reads "Heather A. Barnes".

Heather A. Barnes  
Project Manager  
(618)344-1004 ex.20

---

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Conestoga-Rovers & Associates  
Project: RRG/Clayton Chemical Soil Removal 42192-95  
LabOrder: 06100516  
Report Date: October 31, 2006

## REPORT CONTENTS

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**This reporting package includes the following:**

Analysis Results ( this document ) . . . . .	19	pages
Chain of Custody . . . . .	1	pages
Sample Receipt Checklist . . . . .	1	pages
Associated Information . . . . .	NA	pages
Sample Summary . . . . .	NA	pages
Dates Report . . . . .	NA	pages
QC Report . . . . .	NA	pages
Sub Contracted Lab Report . . . . .	NA	pages
MDL Report . . . . .	NA	pages

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Conestoga-Rovers & Associates  
Project: RRG/Clayton Chemical Soil Removal 42192-95  
LabOrder: 06100516  
Report Date: October 31, 2006

## CASE NARRATIVE

Cooler Receipt Temp 16.0 °C

### Qualifiers

<b>DF</b> - Dilution Factor	<b>B</b> - Analyte detected in the associated Method Blank	<b>E</b> - Value above quantitation range
<b>RL</b> - Reporting Limit	<b>J</b> - Analyte detected below reporting limits	<b>H</b> - Holding time exceeded
<b>ND</b> - Not Detected at the Reporting Limit	<b>R</b> - RPD outside accepted recovery limits	<b>D</b> - Diluted out of sample
<b>Surr</b> - Surrogate Standard added by lab	<b>S</b> - Spike Recovery outside accepted recovery limits	<b>MI</b> - Matrix interference
<b>TNTC</b> - Too numerous to count	<b>X</b> - Value exceeds Maximum Contaminant Level	<b>DNI</b> Did Not Ignite
<b>IDPH</b> - Illinois Department of Public Health	<b>NELAP</b> - IL ELAP and NELAP Accredited Field of Testing	

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-001

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** D-101706-MS-001

**Collection Date:** 10/17/2006 11:01:00 AM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>ASTM D2974</b>								
Percent Moisture		0.1		21.7	%	1	10/19/2006	JMT
<b>STANDARD METHODS 18TH ED. 2540 G</b>								
Total Solids		0.1		78.3	%	1	10/19/2006	JMT
<b>SW-846 1311, 3010A, 6010B, METALS IN TCLP EXTRACT BY ICP</b>								
Arsenic	NELAP	0.0250		< 0.0250	mg/L	1	10/19/2006 10:05:33 PM	CRK
Barium	NELAP	0.0050		0.404	mg/L	1	10/19/2006 10:05:33 PM	CRK
Cadmium	NELAP	0.0020		0.0084	mg/L	1	10/19/2006 10:05:33 PM	CRK
Chromium	NELAP	0.0100		0.0837	mg/L	1	10/19/2006 10:05:33 PM	CRK
Lead	NELAP	0.0400		0.668	mg/L	1	10/19/2006 10:05:33 PM	CRK
Selenium	NELAP	0.0500		< 0.0500	mg/L	1	10/23/2006 9:55:15 AM	SAM
Silver	NELAP	0.0100		< 0.0100	mg/L	1	10/19/2006 10:05:33 PM	CRK
<b>SW-846 1311, 3510C, 8081A, CHLORINATED PESTICIDES IN TCLP EXTRACT BY GC/ECD</b>								
alpha-Chlordane	NELAP	0.00050	S	ND	mg/L	1	10/19/2006 6:05:00 PM	HE
Chlordane	NELAP	0.00500		ND	mg/L	1	10/19/2006 6:05:00 PM	HE
Endrin	NELAP	0.00050	S	ND	mg/L	1	10/19/2006 6:05:00 PM	HE
gamma-BHC	NELAP	0.00050	S	ND	mg/L	1	10/19/2006 6:05:00 PM	HE
gamma-Chlordane	NELAP	0.00050		ND	mg/L	1	10/19/2006 6:05:00 PM	HE
Heptachlor	NELAP	0.00050		ND	mg/L	1	10/19/2006 6:05:00 PM	HE
Heptachlor epoxide	NELAP	0.00050	S	ND	mg/L	1	10/19/2006 6:05:00 PM	HE
Methoxychlor	NELAP	0.00050	S	ND	mg/L	1	10/19/2006 6:05:00 PM	HE
Toxaphene	NELAP	0.00500		ND	mg/L	1	10/19/2006 6:05:00 PM	HE
Surr: Decachlorobiphenyl		10-148		58.9	%REC	1	10/19/2006 6:05:00 PM	HE
Surr: Tetrachloro-m-xylene		20.9-124		59.5	%REC	1	10/19/2006 6:05:00 PM	HE
<b>SW-846 1311, 3510C, 8151A, CHLORINATED HERBICIDES IN TCLP EXTRACT BY GC/ECD</b>								
2,4,5-TP (Silvex)	NELAP	0.20		ND	mg/L	10	10/20/2006 10:23:00 AM	HE
2,4-D	NELAP	0.20		ND	mg/L	10	10/20/2006 10:23:00 AM	HE
Surr: 2,4-Dichlorophenylacetic acid		40-160		85.8	%REC	10	10/20/2006 10:23:00 AM	HE
<b>SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS</b>								
2,4,5-Trichlorophenol	NELAP	0.050		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN
2,4,6-Trichlorophenol	NELAP	0.050		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN
2,4-Dinitrotoluene	NELAP	0.050		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN
Cresols, Total	NELAP	0.500	J	0.052	mg/L	5	10/19/2006 3:33:00 PM	TDN
Hexachlorobenzene	NELAP	0.050		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN
Hexachlorobutadiene	NELAP	0.050		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN
Hexachloroethane	NELAP	0.050		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN
m,p-Cresol	NELAP	0.050		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN



ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-001

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** D-101706-MS-001

**Collection Date:** 10/17/2006 11:01:00 AM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS</b>								
Nitrobenzene	NELAP	0.050		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN
o-Cresol	NELAP	0.050		0.052	mg/L	5	10/19/2006 3:33:00 PM	TDN
Pentachlorophenol	NELAP	1.00		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN
Pyridine	NELAP	0.050		ND	mg/L	5	10/19/2006 3:33:00 PM	TDN
Surr: 2,4,6-Tribromophenol		27.7-149		79.0	%REC	5	10/19/2006 3:33:00 PM	TDN
Surr: 2-Fluorobiphenyl		44.9-116		89.7	%REC	5	10/19/2006 3:33:00 PM	TDN
Surr: 2-Fluorophenol		10.6-78.7		43.0	%REC	5	10/19/2006 3:33:00 PM	TDN
Surr: Nitrobenzene-d5		41.4-104		87.6	%REC	5	10/19/2006 3:33:00 PM	TDN
Surr: Phenol-d5		9.04-52.9		31.6	%REC	5	10/19/2006 3:33:00 PM	TDN
Surr: p-Terphenyl-d14		23.5-114		89.3	%REC	5	10/19/2006 3:33:00 PM	TDN
<b>SW-846 1311, 5030, 8260B, VOLATILE ORGANIC COMPOUNDS IN TCLP EXTRACT BY GC/MS</b>								
1,1-Dichloroethene	NELAP	0.250	J	0.056	mg/L	50	10/20/2006 11:27:00 AM	GEK
1,2-Dichloroethane	NELAP	0.250	J	0.11	mg/L	50	10/20/2006 11:27:00 AM	GEK
1,4-Dichlorobenzene	NELAP	0.250		ND	mg/L	50	10/20/2006 11:27:00 AM	GEK
2-Butanone	NELAP	25.0	S	53.2	mg/L	500	10/20/2006 2:02:00 PM	GEK
Benzene	NELAP	0.100		0.146	mg/L	50	10/20/2006 11:27:00 AM	GEK
Carbon tetrachloride	NELAP	0.250		ND	mg/L	50	10/20/2006 11:27:00 AM	GEK
Chlorobenzene	NELAP	0.250	J	0.12	mg/L	50	10/20/2006 11:27:00 AM	GEK
Chloroform	NELAP	0.250		ND	mg/L	50	10/20/2006 11:27:00 AM	GEK
Tetrachloroethene	NELAP	0.250	X	2.54	mg/L	50	10/20/2006 11:27:00 AM	GEK
Trichloroethene	NELAP	0.250	SX	7.04	mg/L	50	10/20/2006 11:27:00 AM	GEK
Vinyl chloride	NELAP	0.100		ND	mg/L	50	10/20/2006 11:27:00 AM	GEK
Surr: 1,2-Dichloroethane-d4		73.9-129		105.3	%REC	50	10/20/2006 11:27:00 AM	GEK
Surr: 4-Bromofluorobenzene		83-113		97.8	%REC	50	10/20/2006 11:27:00 AM	GEK
Surr: Dibromofluoromethane		83.8-118		99.6	%REC	50	10/20/2006 11:27:00 AM	GEK
Surr: Toluene-d8		85.5-115		107.4	%REC	50	10/20/2006 11:27:00 AM	GEK
<b>SW-846 1311, 7470A IN TCLP EXTRACT</b>								
Mercury	NELAP	0.00020		< 0.00020	mg/L	1	10/19/2006	JMW
<b>SW-846 3050B, 6010B, METALS BY ICP</b>								
Aluminum		125		3530	mg/Kg-dry	20	10/20/2006 1:02:05 PM	SAM
Arsenic		3.13		< 3.13	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Barium		12.5		6630	mg/Kg-dry	20	10/20/2006 1:02:05 PM	SAM
Beryllium		0.13		0.28	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Cadmium		0.25	J	0.23	mg/Kg-dry	1	10/21/2006 1:24:47 AM	SAM
Calcium		125		17100	mg/Kg-dry	20	10/20/2006 1:02:05 PM	SAM
Chromium		1.25		255	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates  
**WorkOrder:** 06100516  
**Lab ID:** 06100516-001  
**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal  
**Client Sample ID:** D-101706-MS-001  
**Collection Date:** 10/17/2006 11:01:00 AM  
**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3050B, 6010B, METALS BY ICP</b>								
Cobalt		1.25		21.7	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Copper		1.25		9.33	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Iron		50.1		16300	mg/Kg-dry	20	10/20/2006 1:02:05 PM	SAM
Lead		5.01		1230	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Magnesium		1.25		660	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Manganese		0.63		58.4	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Nickel		1.25		5.70	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Potassium		12.5		438	mg/Kg-dry	1	10/20/2006 3:22:42 PM	SAM
Selenium		5.01		< 5.01	mg/Kg-dry	1	10/21/2006 9:24:32 AM	SAM
Silver		1.25		2.87	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Sodium		6.26		185	mg/Kg-dry	1	10/20/2006 3:22:42 PM	SAM
Thallium		6.26		< 6.26	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Vanadium		1.25		5.03	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
Zinc		1.25		51.4	mg/Kg-dry	1	10/20/2006 12:26:37 PM	SAM
<b>SW-846 3050B, METALS BY GFAA (TOTAL)</b>								
Antimony	7041	NELAP	0.58	3.91	mg/Kg-dry	1	10/25/2006	SRH
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016		NELAP	1020	ND	µg/Kg-dry	1	10/18/2006 3:54:00 PM	HE
Aroclor 1221		NELAP	1020	ND	µg/Kg-dry	1	10/18/2006 3:54:00 PM	HE
Aroclor 1232		NELAP	1020	ND	µg/Kg-dry	1	10/18/2006 3:54:00 PM	HE
Aroclor 1242		NELAP	1020	ND	µg/Kg-dry	1	10/18/2006 3:54:00 PM	HE
Aroclor 1248		NELAP	1020	ND	µg/Kg-dry	1	10/18/2006 3:54:00 PM	HE
Aroclor 1254		NELAP	1020	ND	µg/Kg-dry	1	10/18/2006 3:54:00 PM	HE
Aroclor 1260		NELAP	1020	ND	µg/Kg-dry	1	10/18/2006 3:54:00 PM	HE
Surr: Decachlorobiphenyl			22-210	75.6	%REC	1	10/18/2006 3:54:00 PM	HE
Surr: Tetrachloro-meta-xylene			10-153	40.2	%REC	1	10/18/2006 3:54:00 PM	HE
<b>SW-846 3550B, 8270C, SEMI-VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
1,2,4-Trichlorobenzene		NELAP	272	ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
1,2-Dichlorobenzene		NELAP	272	ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
1,3-Dichlorobenzene		NELAP	272	ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
1,4-Dichlorobenzene		NELAP	272	ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2,4,5-Trichlorophenol		NELAP	190	ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2,4,6-Trichlorophenol		NELAP	190	ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2,4-Dichlorophenol		NELAP	272	ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2,4-Dimethylphenol		NELAP	272	ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2,4-Dinitrophenol		NELAP	543	ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN

ENVIRONMENTAL TESTING LABORATORY

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## Laboratory Results

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**WorkOrder:** 06100516  
**Lab ID:** 06100516-001  
**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal  
**Client Sample ID:** D-101706-MS-001  
**Collection Date:** 10/17/2006 11:01:00 AM  
**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8270C, SEMI-VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
2,4-Dinitrotoluene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2,6-Dinitrotoluene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2-Chloronaphthalene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2-Chlorophenol	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2-Methoxy-4-methylphenol		353		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2-Methylnaphthalene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2-Nitroaniline	NELAP	543		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
2-Nitrophenol	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
3,3'-Dichlorobenzidine	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
3-Nitroaniline	NELAP	543		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
4,6-Dinitro-2-methylphenol	NELAP	543		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
4-Bromophenyl phenyl ether	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
4-Chloro-3-methylphenol	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
4-Chloroaniline	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
4-Chlorophenyl phenyl ether	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
4-Nitroaniline	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
4-Nitrophenol	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Acenaphthene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Acenaphthylene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Aniline	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Anthracene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Azobenzene		190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Benzidine	NELAP	574		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Benzo(a)anthracene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Benzo(a)pyrene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Benzo(b)fluoranthene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Benzo(g,h,i)perylene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Benzo(k)fluoranthene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Benzoic acid	NELAP	815		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Benzyl alcohol	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Bis(2-chloroethoxy)methane	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Bis(2-chloroethyl)ether	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Bis(2-chloroisopropyl)ether	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Bis(2-ethylhexyl)phthalate	NELAP	190		334	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Butyl benzyl phthalate	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Carbazole		272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN

ENVIRONMENTAL TESTING LABORATORY

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-001

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** D-101706-MS-001

**Collection Date:** 10/17/2006 11:01:00 AM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8270C, SEMI-VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
Chrysene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Dibenzo(a,h)anthracene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Dibenzofuran	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Diethyl phthalate	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Dimethyl phthalate	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Di-n-butyl phthalate	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Di-n-octyl phthalate	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Fluoranthene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Fluorene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Hexachlorobenzene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Hexachlorobutadiene	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Hexachlorocyclopentadiene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Hexachloroethane	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Indeno(1,2,3-cd)pyrene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Isophorone	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
m,p-Cresol	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Naphthalene	NELAP	190	J	100	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Nitrobenzene	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
N-Nitrosodimethylamine	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
N-Nitroso-di-n-propylamine	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
N-Nitrosodiphenylamine	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
o-Cresol	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Pentachlorophenol	NELAP	1090		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Phenanthrene	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Phenol	NELAP	190		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Pyrene	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Pyridine	NELAP	272		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
1,2-Diphenylhydrazine		457		ND	mg/Kg-dry	2	10/18/2006 5:02:00 PM	TDN
Surr: 2,4,6-Tribromophenol		32.7-130		99.5	%REC	2	10/18/2006 5:02:00 PM	TDN
Surr: 2-Fluorobiphenyl		34.1-116		100.2	%REC	2	10/18/2006 5:02:00 PM	TDN
Surr: 2-Fluorophenol		30.5-99		91.1	%REC	2	10/18/2006 5:02:00 PM	TDN
Surr: Nitrobenzene-d5		34.1-101		91.4	%REC	2	10/18/2006 5:02:00 PM	TDN
Surr: Phenol-d5		34.9-110		93.9	%REC	2	10/18/2006 5:02:00 PM	TDN
Surr: p-Terphenyl-d14		41.7-124		99.4	%REC	2	10/18/2006 5:02:00 PM	TDN
<b>SW-846 5035, 8260B, VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
1,1,1,2-Tetrachloroethane	NELAP	5.00		ND	mg/Kg-dry	1	10/23/2006	SUB

ENVIRONMENTAL TESTING LABORATORY

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## Laboratory Results

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**Report Date:** 31-Oct-06

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**Collection Date:** 10/17/2006 11:01:00 AM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 5035, 8260B, VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
1,1,1-Trichloroethane	NELAP	30.1		876	mg/Kg-dry	1	10/23/2006	SUB
1,1,2-Trichloroethane	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
1,1-Dichloroethane	NELAP	30.1		524	mg/Kg-dry	1	10/23/2006	SUB
1,1-Dichloroethene	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
1,2-Dichlorobenzene	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
1,2-Dichloroethane	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
1,2-Dichloropropane	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
1,3-Dichlorobenzene	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
1,4-Dichlorobenzene	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
2-Butanone	NELAP	151		1220	mg/Kg-dry	1	10/23/2006	SUB
2-Hexanone	NELAP	151		ND	mg/Kg-dry	1	10/23/2006	SUB
4-Methyl-2-pentanone	NELAP	151		2350	mg/Kg-dry	1	10/23/2006	SUB
Acetone	NELAP	1510		ND	mg/Kg-dry	1	10/23/2006	SUB
Benzene	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Bromodichloromethane	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Bromoform	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Bromomethane	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Carbon disulfide	NELAP	151		ND	mg/Kg-dry	1	10/23/2006	SUB
Carbon tetrachloride	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Chlorobenzene	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Chloroethane	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Chloroform	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Chloromethane	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
cis-1,2-Dichloroethene	NELAP	30.1		50.5	mg/Kg-dry	1	10/23/2006	SUB
cis-1,3-Dichloropropene	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Dibromochloromethane	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Ethylbenzene	NELAP	30.1		3110	mg/Kg-dry	1	10/23/2006	SUB
Methyl tert-butyl ether	NELAP	60.3		ND	mg/Kg-dry	1	10/23/2006	SUB
Methylene chloride	NELAP	1510		1720	mg/Kg-dry	1	10/23/2006	SUB
Naphthalene	NELAP	30.1		186	mg/Kg-dry	1	10/23/2006	SUB
Tetrachloroethene	NELAP	30.1		1060	mg/Kg-dry	1	10/23/2006	SUB
Toluene	NELAP	30.1	E	19400	mg/Kg-dry	1	10/23/2006	SUB
trans-1,2-Dichloroethene	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
trans-1,3-Dichloropropene	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB
Trichloroethene	NELAP	30.1		895	mg/Kg-dry	1	10/23/2006	SUB
Vinyl chloride	NELAP	30.1		ND	mg/Kg-dry	1	10/23/2006	SUB

ENVIRONMENTAL TESTING LABORATORY

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**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** D-101706-MS-001

**Collection Date:** 10/17/2006 11:01:00 AM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 5035, 8260B, VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
Xylenes, Total	NELAP	60.3		14000	mg/Kg-dry	1	10/23/2006	SUB
Surr: 1,2-Dichloroethane-d4		68-132		109.0	%REC	1	10/23/2006	SUB
Surr: 4-Bromofluorobenzene		72-127		102.0	%REC	1	10/23/2006	SUB
Surr: Dibromofluoromethane		70-135		104.0	%REC	1	10/23/2006	SUB
Surr: Toluene-d8		73-123		108.0	%REC	1	10/23/2006	SUB
<b>SW-846 7471A</b>								
Mercury	NELAP	0.012		0.489	mg/Kg-dry	1	10/18/2006	SAM
<b>SW-846 9014 (REACTIVE)</b>								
Cyanide, Reactive	NELAP	4.84		< 4.84	mg/Kg	1	10/19/2006	JLS
<b>SW-846 9034 (REACTIVE)</b>								
Sulfide, Reactive	NELAP	9.7		< 9.7	mg/Kg	1	10/18/2006	AET

### Sample Narrative

SW-846 5035, 8260B, Volatile Organic Compounds by GC/MS

LCS: The spike recovery for 2-Hexanone(MBK) and Acetone exceeded established acceptance limits. However, all samples were below the reporting and/ or regulatory limit so the data is reportable.

MS/MSD: The spike recovery was outside acceptance limits for the MS and/ or MSD. Batch accepted based on acceptable initial and continuing calibration results.

The concentration indicated for Toluene is an estimated value above the calibration range of the instrument. This value is considered an estimate.

Analysis performed by Keystone Laboratories, Inc.

SW-846 1311, 3510C, 8081A, Chlorinated Pesticides in TCLP Extract by GC/ECD

MS & MSD recovery was outside QC limits due to matrix interference.

SW-846 3550B, 8270C, Semi-Volatile Organic Compounds by GC/MS

Elevated reporting limit due to high levels of target and/or non-target analytes.

SW-846 1311, 5030, 8260B, Volatile Organic Compounds in TCLP Extract by GC/MS

Matrix spike recoveries exceeded QC limits because of sample composition.

ENVIRONMENTAL TESTING LABORATORY

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-002

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** S-101706-MS-029

**Collection Date:** 10/17/2006 3:45:00 PM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>ASTM D2974</b>								
Percent Moisture		0.1		17.6	%	1	10/19/2006	JMT
<b>STANDARD METHODS 18TH ED. 2540 G</b>								
Total Solids		0.1		82.4	%	1	10/19/2006	JMT
<b>SW-846 1311, 3010A, 6010B, METALS IN TCLP EXTRACT BY ICP</b>								
Arsenic	NELAP	0.0250		< 0.0250	mg/L	1	10/19/2006 10:15:29 PM	CRK
Barium	NELAP	0.0050		0.293	mg/L	1	10/19/2006 10:15:29 PM	CRK
Cadmium	NELAP	0.0020		0.0585	mg/L	1	10/19/2006 10:15:29 PM	CRK
Chromium	NELAP	0.0100		0.0514	mg/L	1	10/19/2006 10:15:29 PM	CRK
Lead	NELAP	0.0400		0.228	mg/L	1	10/19/2006 10:15:29 PM	CRK
Selenium	NELAP	0.0500		< 0.0500	mg/L	1	10/23/2006 9:59:43 AM	SAM
Silver	NELAP	0.0100		< 0.0100	mg/L	1	10/19/2006 10:15:29 PM	CRK
<b>SW-846 1311, 3510C, 8081A, CHLORINATED PESTICIDES IN TCLP EXTRACT BY GC/ECD</b>								
alpha-Chlordane	NELAP	0.00020		ND	mg/L	1	10/19/2006 7:55:00 PM	HE
Chlordane	NELAP	0.00200		ND	mg/L	1	10/19/2006 7:55:00 PM	HE
Endrin	NELAP	0.00020		ND	mg/L	1	10/19/2006 7:55:00 PM	HE
gamma-BHC	NELAP	0.00020		ND	mg/L	1	10/19/2006 7:55:00 PM	HE
gamma-Chlordane	NELAP	0.00020		ND	mg/L	1	10/19/2006 7:55:00 PM	HE
Heptachlor	NELAP	0.00020		ND	mg/L	1	10/19/2006 7:55:00 PM	HE
Heptachlor epoxide	NELAP	0.00020		ND	mg/L	1	10/19/2006 7:55:00 PM	HE
Methoxychlor	NELAP	0.00020		ND	mg/L	1	10/19/2006 7:55:00 PM	HE
Toxaphene	NELAP	0.00200		ND	mg/L	1	10/19/2006 7:55:00 PM	HE
Surr: Decachlorobiphenyl		10-148		90.2	%REC	1	10/19/2006 7:55:00 PM	HE
Surr: Tetrachloro-m-xylene		20.9-124		74.6	%REC	1	10/19/2006 7:55:00 PM	HE
<b>SW-846 1311, 3510C, 8151A, CHLORINATED HERBICIDES IN TCLP EXTRACT BY GC/ECD</b>								
2,4,5-TP (Silvex)	NELAP	0.080		ND	mg/L	10	10/20/2006 12:23:00 PM	HE
2,4-D	NELAP	0.080		ND	mg/L	10	10/20/2006 12:23:00 PM	HE
Surr: 2,4-Dichlorophenylacetic acid		40-160		87.6	%REC	10	10/20/2006 12:23:00 PM	HE
<b>SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS</b>								
2,4,5-Trichlorophenol	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
2,4,6-Trichlorophenol	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
2,4-Dinitrotoluene	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
Cresols, Total	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
Hexachlorobenzene	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
Hexachlorobutadiene	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
Hexachloroethane	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
m,p-Cresol	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-002

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** S-101706-MS-029

**Collection Date:** 10/17/2006 3:45:00 PM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS</b>								
Nitrobenzene	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
o-Cresol	NELAP	0.040		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
Pentachlorophenol	NELAP	0.080		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
Pyridine	NELAP	0.080		ND	mg/L	1	10/19/2006 5:22:00 PM	TDN
Surr: 2,4,6-Tribromophenol		27.7-149		88.6	%REC	1	10/19/2006 5:22:00 PM	TDN
Surr: 2-Fluorobiphenyl		44.9-116		86.8	%REC	1	10/19/2006 5:22:00 PM	TDN
Surr: 2-Fluorophenol		10.6-78.7		50.1	%REC	1	10/19/2006 5:22:00 PM	TDN
Surr: Nitrobenzene-d5		41.4-104		88.3	%REC	1	10/19/2006 5:22:00 PM	TDN
Surr: Phenol-d5		9.04-52.9		34.7	%REC	1	10/19/2006 5:22:00 PM	TDN
Surr: p-Terphenyl-d14		23.5-114		89.4	%REC	1	10/19/2006 5:22:00 PM	TDN
<b>SW-846 1311, 5030, 8260B, VOLATILE ORGANIC COMPOUNDS IN TCLP EXTRACT BY GC/MS</b>								
1,1-Dichloroethene	NELAP	0.250		ND	mg/L	50	10/20/2006 12:29:00 PM	GEK
1,2-Dichloroethane	NELAP	0.250		ND	mg/L	50	10/20/2006 12:29:00 PM	GEK
1,4-Dichlorobenzene	NELAP	0.250		ND	mg/L	50	10/20/2006 12:29:00 PM	GEK
2-Butanone	NELAP	2.50		ND	mg/L	50	10/20/2006 12:29:00 PM	GEK
Benzene	NELAP	0.100		ND	mg/L	50	10/20/2006 12:29:00 PM	GEK
Carbon tetrachloride	NELAP	0.250		ND	mg/L	50	10/20/2006 12:29:00 PM	GEK
Chlorobenzene	NELAP	0.250		ND	mg/L	50	10/20/2006 12:29:00 PM	GEK
Chloroform	NELAP	0.250		ND	mg/L	50	10/20/2006 12:29:00 PM	GEK
Tetrachloroethene	NELAP	0.250		0.526	mg/L	50	10/20/2006 12:29:00 PM	GEK
Trichloroethene	NELAP	0.250		0.394	mg/L	50	10/20/2006 12:29:00 PM	GEK
Vinyl chloride	NELAP	0.100		ND	mg/L	50	10/20/2006 12:29:00 PM	GEK
Surr: 1,2-Dichloroethane-d4		73.9-129		106.5	%REC	50	10/20/2006 12:29:00 PM	GEK
Surr: 4-Bromofluorobenzene		83-113		94.7	%REC	50	10/20/2006 12:29:00 PM	GEK
Surr: Dibromofluoromethane		83.8-118		104.8	%REC	50	10/20/2006 12:29:00 PM	GEK
Surr: Toluene-d8		85.5-115		100.7	%REC	50	10/20/2006 12:29:00 PM	GEK
<b>SW-846 1311, 7470A IN TCLP EXTRACT</b>								
Mercury	NELAP	0.00020		< 0.00020	mg/L	1	10/19/2006	JMW
<b>SW-846 3050B, 6010B, METALS BY ICP</b>								
Aluminum	NELAP	100		4800	mg/Kg-dry	20	10/20/2006 1:32:04 PM	SAM
Arsenic	NELAP	2.50	J	2.3	mg/Kg-dry	1	10/20/2006 1:35:47 PM	SAM
Barium	NELAP	0.50		101	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Beryllium	NELAP	0.10		0.76	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Cadmium	NELAP	0.20		8.07	mg/Kg-dry	1	10/21/2006 1:31:28 AM	SAM
Calcium	NELAP	250		45500	mg/Kg-dry	50	10/20/2006 1:37:40 PM	SAM
Chromium	NELAP	1.00		75.6	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM



ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates  
**WorkOrder:** 06100516  
**Lab ID:** 06100516-002  
**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal  
**Client Sample ID:** S-101706-MS-029  
**Collection Date:** 10/17/2006 3:45:00 PM  
**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3050B, 6010B, METALS BY ICP</b>								
Cobalt	NELAP	1.00		4.05	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Copper	NELAP	1.00		34.5	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Iron	NELAP	40.0		14800	mg/Kg-dry	20	10/20/2006 1:32:04 PM	SAM
Lead	NELAP	4.00		270	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Magnesium	NELAP	1.00		1410	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Manganese	NELAP	0.50		82.2	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Nickel	NELAP	1.00		16.3	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Potassium	NELAP	20.0		1070	mg/Kg-dry	2	10/20/2006 3:39:15 PM	SAM
Selenium	NELAP	4.00		< 4.00	mg/Kg-dry	1	10/21/2006 9:27:54 AM	SAM
Silver	NELAP	1.00		1.65	mg/Kg-dry	1	10/20/2006 1:29:39 PM	SAM
Sodium	NELAP	5.00		436	mg/Kg-dry	1	10/20/2006 3:25:01 PM	SAM
Thallium	NELAP	5.00		< 5.00	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Vanadium	NELAP	1.00		35.0	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
Zinc	NELAP	1.00		148	mg/Kg-dry	1	10/20/2006 12:34:22 PM	SAM
<b>SW-846 3050B, METALS BY GFAA (TOTAL)</b>								
Antimony 7041	NELAP	0.49		2.52	mg/Kg-dry	1	10/24/2006	SRH
<b>SW-846 3550B, 8081A, CHLORINATED PESTICIDES BY GC/ECD</b>								
4,4'-DDD	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
4,4'-DDE	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
4,4'-DDT	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Aldrin	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
alpha-BHC	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
alpha-Chlordane	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
beta-BHC	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Chlordane	NELAP	24.1		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
delta-BHC	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Dieldrin	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Endosulfan I	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Endosulfan II	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Endosulfan sulfate	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Endrin	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Endrin aldehyde	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Endrin ketone	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
gamma-BHC	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
gamma-Chlordane		12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Heptachlor	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-002

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** S-101706-MS-029

**Collection Date:** 10/17/2006 3:45:00 PM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8081A, CHLORINATED PESTICIDES BY GC/ECD</b>								
Heptachlor epoxide	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Methoxychlor	NELAP	12.0		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Toxaphene	NELAP	216		ND	µg/Kg-dry	1	10/19/2006 5:29:00 PM	HE
Surr: Decachlorobiphenyl		48-149		128.4	%REC	1	10/19/2006 5:29:00 PM	HE
Surr: Tetrachloro-m-xylene		19-145		71.5	%REC	1	10/19/2006 5:29:00 PM	HE
<b>SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016	NELAP	4600		8250	µg/Kg-dry	100	10/18/2006 4:35:00 PM	HE
Aroclor 1221	NELAP	4600		ND	µg/Kg-dry	100	10/18/2006 4:35:00 PM	HE
Aroclor 1232	NELAP	4600		ND	µg/Kg-dry	100	10/18/2006 4:35:00 PM	HE
Aroclor 1242	NELAP	4600		ND	µg/Kg-dry	100	10/18/2006 4:35:00 PM	HE
Aroclor 1248	NELAP	4600		ND	µg/Kg-dry	100	10/18/2006 4:35:00 PM	HE
Aroclor 1254	NELAP	4600		ND	µg/Kg-dry	100	10/18/2006 4:35:00 PM	HE
Aroclor 1260	NELAP	4600		ND	µg/Kg-dry	100	10/18/2006 4:35:00 PM	HE
Surr: Decachlorobiphenyl		22-210	S	812.0	%REC	100	10/18/2006 4:35:00 PM	HE
Surr: Tetrachloro-meta-xylene		10-153		34.1	%REC	100	10/18/2006 4:35:00 PM	HE
<b>SW-846 3550B, 8270C, SEMI-VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
1,2,4-Trichlorobenzene	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
1,2-Dichlorobenzene	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
1,3-Dichlorobenzene	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
1,4-Dichlorobenzene	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2,4,5-Trichlorophenol	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2,4,6-Trichlorophenol	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2,4-Dichlorophenol	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2,4-Dimethylphenol	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2,4-Dinitrophenol	NELAP	6.03	S	ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2,4-Dinitrotoluene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2,6-Dinitrotoluene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2-Chloronaphthalene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2-Chlorophenol	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2-Methoxy-4-methylphenol		3.92		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2-Methylnaphthalene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2-Nitroaniline	NELAP	6.03		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
2-Nitrophenol	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
3,3'-Dichlorobenzidine	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
3-Nitroaniline	NELAP	6.03		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
4,6-Dinitro-2-methylphenol	NELAP	6.03		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-002

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** S-101706-MS-029

**Collection Date:** 10/17/2006 3:45:00 PM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8270C, SEMI-VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
4-Bromophenyl phenyl ether	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
4-Chloro-3-methylphenol	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
4-Chloroaniline	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
4-Chlorophenyl phenyl ether	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
4-Nitroaniline	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
4-Nitrophenol	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Acenaphthene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Acenaphthylene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Aniline	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Anthracene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Azobenzene		2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Benzidine	NELAP	6.36		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Benzo(a)anthracene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Benzo(a)pyrene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Benzo(b)fluoranthene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Benzo(g,h,i)perylene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Benzo(k)fluoranthene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Benzoic acid	NELAP	9.04		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Benzyl alcohol	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Bis(2-chloroethoxy)methane	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Bis(2-chloroethyl)ether	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Bis(2-chloroisopropyl)ether	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Bis(2-ethylhexyl)phthalate	NELAP	2.11	S	7.76	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Butyl benzyl phthalate	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Carbazole		3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Chrysene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Dibenzo(a,h)anthracene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Dibenzofuran	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Diethyl phthalate	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Dimethyl phthalate	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Di-n-butyl phthalate	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Di-n-octyl phthalate	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Fluoranthene	NELAP	2.11	J	1.0	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Fluorene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Hexachlorobenzene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Hexachlorobutadiene	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN

ENVIRONMENTAL TESTING LABORATORY

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-002

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** S-101706-MS-029

**Collection Date:** 10/17/2006 3:45:00 PM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3550B, 8270C, SEMI-VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
Hexachlorocyclopentadiene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Hexachloroethane	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Indeno(1,2,3-cd)pyrene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Isophorone	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
m,p-Cresol	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Naphthalene	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Nitrobenzene	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
N-Nitrosodimethylamine	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
N-Nitroso-di-n-propylamine	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
N-Nitrosodiphenylamine	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
o-Cresol	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Pentachlorophenol	NELAP	12.1	S	ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Phenanthrene	NELAP	2.11	J	0.72	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Phenol	NELAP	2.11		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Pyrene	NELAP	3.01	J	1.0	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Pyridine	NELAP	3.01		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
1,2-Diphenylhydrazine		5.06		ND	mg/Kg-dry	5	10/18/2006 5:40:00 PM	TDN
Surr: 2,4,6-Tribromophenol		32.7-130		80.3	%REC	5	10/18/2006 5:40:00 PM	TDN
Surr: 2-Fluorobiphenyl		34.1-116		76.8	%REC	5	10/18/2006 5:40:00 PM	TDN
Surr: 2-Fluorophenol		30.5-99		61.8	%REC	5	10/18/2006 5:40:00 PM	TDN
Surr: Nitrobenzene-d5		34.1-101		73.1	%REC	5	10/18/2006 5:40:00 PM	TDN
Surr: Phenol-d5		34.9-110		70.5	%REC	5	10/18/2006 5:40:00 PM	TDN
Surr: p-Terphenyl-d14		41.7-124		74.9	%REC	5	10/18/2006 5:40:00 PM	TDN
<b>SW-846 5035, 8260B, VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
1,1,1,2-Tetrachloroethane	NELAP	0.198		ND	mg/Kg-dry	1	10/23/2006	SUB
1,1,1-Trichloroethane	NELAP	0.198	SR	26.4	mg/Kg-dry	1	10/23/2006	SUB
1,1,2-Trichloroethane	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
1,1-Dichloroethane	NELAP	0.198	S	1.64	mg/Kg-dry	1	10/23/2006	SUB
1,1-Dichloroethene	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
1,2-Dichlorobenzene	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
1,2-Dichloroethane	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
1,2-Dichloropropane	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
1,3-Dichlorobenzene	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
1,4-Dichlorobenzene	NELAP	0.198	S	0.227	mg/Kg-dry	1	10/23/2006	SUB
2-Butanone	NELAP	0.988	S	ND	mg/Kg-dry	1	10/23/2006	SUB
2-Hexanone	NELAP	0.988	S	ND	mg/Kg-dry	1	10/23/2006	SUB

ENVIRONMENTAL TESTING LABORATORY

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-002

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** S-101706-MS-029

**Collection Date:** 10/17/2006 3:45:00 PM

**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 5035, 8260B, VOLATILE ORGANIC COMPOUNDS BY GC/MS</b>								
4-Methyl-2-pentanone	NELAP	0.988	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Acetone	NELAP	9.88	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Benzene	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Bromodichloromethane	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Bromoform	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Bromomethane	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Carbon disulfide	NELAP	0.988	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Carbon tetrachloride	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Chlorobenzene	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Chloroethane	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Chloroform	NELAP	0.198	S	0.362	mg/Kg-dry	1	10/23/2006	SUB
Chloromethane	NELAP	0.198	RS	ND	mg/Kg-dry	1	10/23/2006	SUB
cis-1,2-Dichloroethene	NELAP	0.198	S	6.66	mg/Kg-dry	1	10/23/2006	SUB
cis-1,3-Dichloropropene	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Dibromochloromethane	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Ethylbenzene	NELAP	0.198	S	0.791	mg/Kg-dry	1	10/23/2006	SUB
Methyl tert-butyl ether	NELAP	0.395	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Methylene chloride	NELAP	9.88	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Naphthalene	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Tetrachloroethene	NELAP	0.198	SRE	83.9	mg/Kg-dry	1	10/23/2006	SUB
Toluene	NELAP	0.198	S	0.727	mg/Kg-dry	1	10/23/2006	SUB
trans-1,2-Dichloroethene	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
trans-1,3-Dichloropropene	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Trichloroethene	NELAP	0.198	SR	21.2	mg/Kg-dry	1	10/23/2006	SUB
Vinyl chloride	NELAP	0.198	S	ND	mg/Kg-dry	1	10/23/2006	SUB
Xylenes, Total	NELAP	0.395	S	5.17	mg/Kg-dry	1	10/23/2006	SUB
Surr: 1,2-Dichloroethane-d4		68-132		94.9	%REC	1	10/23/2006	SUB
Surr: 4-Bromofluorobenzene		72-127		98.4	%REC	1	10/23/2006	SUB
Surr: Dibromofluoromethane		70-135		100	%REC	1	10/23/2006	SUB
Surr: Toluene-d8		73-123		95.9	%REC	1	10/23/2006	SUB
<b>SW-846 7471A</b>								
Mercury	NELAP	0.012		0.459	mg/Kg-dry	1	10/18/2006	SAM
<b>SW-846 8151A, CHLORINATED HERBICIDES BY GC/ECD</b>								
2,4,5-T		0.05	S	ND	mg/Kg-dry	1	10/25/2006	SUB
2,4,5-TP (Silvex)		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
2,4-D		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB

ENVIRONMENTAL TESTING LABORATORY

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates  
**WorkOrder:** 06100516  
**Lab ID:** 06100516-002  
**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal  
**Client Sample ID:** S-101706-MS-029  
**Collection Date:** 10/17/2006 3:45:00 PM  
**Matrix:** SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 8151A, CHLORINATED HERBICIDES BY GC/ECD</b>								
2,4-DB		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
3,5-Dichlorobenzoic Acid		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
Acifluorfen		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
Bentazon		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
Chloramben		0.05	S	ND	mg/Kg-dry	1	10/25/2006	SUB
Dalapon		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
DCPA		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
Dicamba		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
Dichlorprop		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
Dinoseb		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
Pentachlorophenol		0.05	S	0.09	mg/Kg-dry	1	10/25/2006	SUB
Picloram		0.05		ND	mg/Kg-dry	1	10/25/2006	SUB
Surr: 2,5-Dichlorobenzoic acid		50-121		116.0	%REC	1	10/25/2006	SUB
<b>SW-846 9014 (REACTIVE)</b>								
Cyanide, Reactive	NELAP	4.69		< 4.69	mg/Kg	1	10/19/2006	JLS
<b>SW-846 9034 (REACTIVE)</b>								
Sulfide, Reactive	NELAP	9.4		< 9.4	mg/Kg	1	10/18/2006	AET

### Sample Narrative

SW-846 8151A, Chlorinated Herbicides by GC/ECD

The spike recovery for Chloramben and 2,4,5,-T is outside of control limits due to sample matrix interference.

The spike recovery for Pentachlorophenol was outside of acceptance limits due to dilution required for high analyte concentration and/ or matrix interference.

Analysis performed by Keystone Laboratories, Inc.

SW-846 5035, 8260B, Volatile Organic Compounds by GC/MS

MS/MSD: RPD for spikes was outside acceptance limits due to matrix interference. The LCS/LCSD were within acceptance limits therefore data is reportable.

The concentration indicated for Tetrachlorethene is an estimated value above the calibration range of the instrument. This value is considered an estimate .

Analysis performed by Keystone Laboratories, Inc.

SW-846 3550B, 8081A, Chlorinated Pesticides by GC/ECD

Elevated reporting limit due to sample composition.

SW-846 3550B, 8082, PolyChlorinated Biphenyls (PCBs) by GC/ECD

Surrogate was diluted out.

MS & MSD were diluted out.

SW-846 3550B, 8270C, Semi-Volatile Organic Compounds by GC/MS

Matrix spike did not recover within QC limits because of sample dilution.

Elevated reporting limit due to high levels of target and/or non-target analytes.

ENVIRONMENTAL TESTING LABORATORY

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## Laboratory Results

**CLIENT:** Conestoga-Rovers & Associates

**WorkOrder:** 06100516

**Lab ID:** 06100516-003

**Report Date:** 31-Oct-06

**Client Project:** RRG/Clayton Chemical Soil Removal

**Client Sample ID:** Drum A-1

**Collection Date:** 10/17/2006 3:30:00 PM

**Matrix:** OIL

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
<b>SW-846 3580A, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD</b>								
Aroclor 1016		75.0	S	112	mg/Kg	50	10/18/2006 2:10:00 PM	HE
Aroclor 1221		75.0		ND	mg/Kg	50	10/18/2006 2:10:00 PM	HE
Aroclor 1232		75.0		ND	mg/Kg	50	10/18/2006 2:10:00 PM	HE
Aroclor 1242		75.0		ND	mg/Kg	50	10/18/2006 2:10:00 PM	HE
Aroclor 1248		75.0		ND	mg/Kg	50	10/18/2006 2:10:00 PM	HE
Aroclor 1254		75.0		ND	mg/Kg	50	10/18/2006 2:10:00 PM	HE
Aroclor 1260		75.0	S	477	mg/Kg	50	10/18/2006 2:10:00 PM	HE
Surr: Decachlorobiphenyl		10-176		79.4	%REC	1	10/18/2006 1:01:00 PM	HE
Surr: Tetrachloro-meta-xylene		33-178		74.8	%REC	1	10/18/2006 1:01:00 PM	HE

### Sample Narrative

SW-846 3580A, 8082, PolyChlorinated Biphenyls (PCBs) by GC/ECD

MS & MSD recovery was outside QC limits due to matrix interference.